

Monsanto

J. A. Glass, LP&S, Texas City

C. M. McCallagh

October 30, 1978

P-Bulletin P-0130, Respiratory Protective Program

PMSB MEMBERS ONLY

PLAINTIFF'S EXHIBIT

MON-2598

Attached is a proposed replacement for P-Bulletin, P-0130 entitled Respiratory Life Support Systems. The contents of the bulletin have been extensively revised by the Safety Advisory Committee, and the title has been changed to Respiratory Protective Program. Also attached is a marked-up copy of the old Bulletin for your use in comparing the old and new.

Please review the proposed revision and send your comments to Tom Ryan O-10A by November 8. Additional copies of this proposal are being sent to you for members of your staff.

J. A. Glass
J. A. Glass

JAG/jge

Attachment

Mike
I have asked your
staff to have comments
back to you on 11/3/78
They were each sent copies.
Er.

see page 2
WJH

Redden

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LAM025174

PROCEDURE BULLETIN—TEXAS CITY PLANT P-0130

RESPIRATORY PROTECTIVE PROGRAM

I. PURPOSE

This bulletin establishes respiratory protection procedures to protect employees against exposure to chemical or physical contaminants encountered during normal and emergency conduct of their work.

II. SCOPE

This procedure covers (1) the maintenance of good breathing air quality, and (2) the selection, upkeep, and training in the use of respiratory equipment used in various parts of the plant.

The equipment and procedures specified in this bulletin are considered to be those required to maintain safe and healthy working conditions and to meet applicable government regulations.

III. BREATHING AIR SUPPLY AND DISTRIBUTION SYSTEM

1. Introduction

This procedure covers all users of compressed air used for personal breathing protection. Breathing air is supplied by a separate pipeline header system piped directly from the plant air compressors to the departments requiring air for breathing equipment. Departments requiring breathing air, but not connected to the breathing air distribution system, shall use cylinder compressed breathing air or other methods approved by the Loss Prevention & Safety Department.

This procedure does not cover the utility or instrument air systems except to state the UTILITY OR INSTRUMENT AIR SHALL NOT BE USED FOR PERSONAL BREATHING PROTECTION.

CAUTION MUST BE USED AT ALL TIMES TO AVOID CROSS CONTAMINATION OF BREATHING AIR WITH ANY OTHER SYSTEM.

2. Responsibilities

A. Air Supply

Department 984, the Compressed Air Department, is responsible for the supply of breathing air from the plant air compressors to the distribution header

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All tie-ins to the breathing air plant header must be approved by the manufacturing supervisor of the Compressed Air Department. Plant Engineering must be informed to keep distribution piping drawings up-to-date.

We are presently using air cylinders on trailers for hydro shutdowns. Trailers should be covered by this bulletin

or trailers load
The plant Stores Department is responsible for maintaining an adequate cylinder supply of breathing air for purchase by units not using the plant header. The contents of each cylinder, on receipt, shall be checked for oxygen concentration. Analysis shall indicate $21\% \pm 1\%$ oxygen for acceptance. Accepted cylinders shall be tagged and signed by the individual who conducted the analysis.

The Purchasing Department shall not purchase cylinder air from a supplier other than the Linde Division of Union Carbide without prior approval of the Loss Prevention & Safety Department. A change in supplier shall first require a letter of quality certification acceptable to the Loss Prevention & Safety Department. Acceptance shall also be based on inspection of the supplier's cylinder filling facilities.

B. Pipeline

The Compressed Air Department is responsible for the breathing air distribution header up to the battery limits of using departments, or up to, and including the first main block valve off the header. They shall safeguard the integrity of the distribution header system by a visual monthly inspection of the system to include structural integrity, unauthorized tie-ins, excessive corrosion, etc. A written report will be made to the Department head.

Using departments are responsible for piping systems from the header block valve and inside battery limits. Owners are responsible to see that the breathing air system is not contaminated from within an owner's system. They shall safeguard the integrity of the facility by using the breathing air system for personal breathing protection only. A monthly visual check, as per Procedure Bulletin P-0100, "Plant Safety Program," shall be conducted of in-battery breathing air lines.

A written report will be made to the Department head. Owners are also responsible for conforming to installation and hose station standards.

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RESPIRATORY PROTECTIVE PROGRAM

3. Procedure

Breathing air shall be piped to personal protective breathing equipment hose stations only. All such hose stations shall use the male quick disconnect, MSA Model No. CS47371 single fitting or Model No. 47370 manifold. The above fittings which match the standard issue breathing air supply hoses, are obtainable from Safety Supply. These quick connect fittings shall be used in breathing air systems only.

Please be aware that Thor fittings are to be used on nitrogen hoses and hose stations. Refer to Bulletin P-0126.

The breathing air system shall be identified according to the Texas City Plant color code procedure. The base color shall be blue and the stripe white. Each breathing air hose station shall also be identified by sign reading "Breathing Air" which is obtainable from the Stores Department.

IV. RESPIRATORY SYSTEMS

1. Introduction

The Texas City Plant shall make conveniently available a type of respiratory protection equipment suitable for the work to be performed and those employees required to perform such work shall be required to use such equipment. (See IV 3.A 10) No unprotected person shall knowingly be subjected to a hazardous environmental condition during the performance of the work assigned.

2. Responsibilities

A. Department, Unit or Craft Supervision

Supervisors of persons performing work requiring respiratory protection are responsible to:

- (1) Inspect the work areas in conjunction with Loss Prevention and Safety to evaluate possible exposure hazards and need for respiratory protective equipment. Specify applicable equipment.
- (2) Prepare and maintain written procedures for the selection and use of protective equipment and its proper care and storage.
- (3) Train employees in proper selection, care, storage and use of respiratory protective equipment and maintain records of this training.

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RESPIRATORY PROTECTIVE PROGRAM

- (4) Inspect all respiratory equipment and maintain a record of these inspections.
- (5) Review all changes in scope of the work in progress for its impact on respiratory protection requirements.
- (6) Insure the proper application of use, training, inspections, and record keeping as specified above

B. Loss Prevention and Safety (LP&S)

The LP&S department is responsible to:

- (1) Work with operating unit and craft supervision in the inspection of work areas to evaluate possible exposure hazards and need for respiratory protective equipment. Based on the inspection specify applicable equipment.
- (2) Provide respiratory protective equipment to the units and to repair, clean, inspect, sterilize, and seal packaging of masks returned to Safety Supply.
- (3) Train supervision in the use, care and storage of respiratory protective equipment.
- (4) Maintain a log book record in Safety Supply on the "Self Contained Breathing Apparatus" and Model SW Canister Masks.

3. Procedures

A. Respiratory Equipment

- (1) Written procedures shall be prepared, in each unit, covering the selection and safe use of respirators in dangerous atmospheres that might be encountered in normal or emergency operations.
- (2) Employees will be trained by their supervisors in the proper use of the equipment. Refresher training will be given annually.

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- (3) The person required to use the equipment must be able to demonstrate that a proper respirator fit can be obtained. (See Section 3B - Respiratory Fitting).
- (4) Information pertaining to the respiratory devices and a guide to their selection will be maintained by the Loss Prevention and Safety section for plant-wide and new applications. In addition, each department and craft shall maintain respiratory information pertaining to their specific area in their operating or maintenance procedure manual.
- (5) Those individuals who must wear prescription eyeglasses to perform their work, and also are regularly required to use full face respiratory equipment, will be issued a full face respirator with special eyeglass inserts for their personal use. This equipment will be available from Loss Prevention & Safety at the specific request of the unit supervision.
- (6) In areas where the wearer of a respirator could be overcome by toxic or oxygen deficient atmosphere, a standby person must be nearby with suitable rescue equipment. In case of emergency the standby man should sound an alarm and then begin rescue operations using self-contained breathing apparatus.
- (7) Respiratory equipment, stored in the unit, will be inspected monthly by operating personnel, per Procedure Bulletin P-0116, "Area Safety Inspections," and semi-annually by Safety Department personnel to assure that it is in satisfactory working condition.
- (8) Used equipment will be returned to the Safety Supply Store for reprocessing. Disposable dust respirators are to be discarded after one use.
- (9) Gas mask canisters must be properly identified and the label must specify the atmospheric contaminants for which it offers protection.
- (10) Each unit or craft supervisor shall keep current, a list of persons that are required to use respiratory equipment in the performance of their work. Update annually or when operating conditions change. A key consideration is the work being performed, not the general location of the work.

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- (11) Each unit or craft supervisor shall keep current, a list of persons that are temporarily not physically able to use respiratory equipment and perform the work so they will not be assigned these tasks. Update annually or when operating conditions change.

B. Respirator Fitting

- (1) The purpose of any protective mask is to isolate the wearer from the surrounding atmosphere, by providing a leak-tight seal between the mask and the face. To insure the best possible opportunity for a good face piece to face seal, all employees who are required to wear respiratory equipment, must be free of facial hair protruding into the sealing portion of the respirator.

NOTE: A fit test will not be conducted on anyone not meeting this requirement.

- (2) The user must test for fit each time it is put on.
- (3) The user must check for fit by the following methods:
- a. Positive Pressure Test: Close the exhalation valve and exhale gently into the facepiece. The facepiece fit is considered satisfactory if a slight positive pressure can be built up inside the facepiece without any evidence of outward leakage of air at the seal. For most respirators, this method of leak testing requires that the wearer first remove the exhalation valve cover and then carefully replace it after the test.
 - b. Negative Pressure Test: Close off the inlet opening of the canister or cartridge(s) by covering the palm of the hand(s) or by replacing the seal(s). Inhale gently so that the facepiece collapses slightly and hold the breath for approximately 10 seconds. If the facepiece remains in its slightly collapsed condition and no inward leakage of air is detected, the fit of the respirator is considered satisfactory.
 - c. Manufacturer's Instructions: Follow the directions provided by the respirator manufacturer.

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- d. Movement Check: The employee using the respirator should also turn his/her head from side to side and up and down to ensure that the respirator is sealed and will not become loose during wear.
- (4) User must wear the respirator as originally designed:
 - a. All functional parts must be in place and worn in appropriate positions.
 - b. All straps shall be secure.
 - c. Modification to the respirator straps shall not be made.
- (5) Users in areas having assigned personal respirators will use their assigned respirator in fit testing.
- (6) If special glasses are issued for use with respirators, they will be used in fit testing.
- (7) Dentures may seriously affect the face piece fit and therefore should be worn during fit testing and use.

Written by:

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G. T. Ryan
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Approved: _____

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Approved: _____

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Reviewed by:

Plant Manager's Safety
Board

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RESPIRATORY LIFE SUPPORT SYSTEMS

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6/5/78

I. PURPOSE

This bulletin establishes procedures for all people working in the Texas City plant on the use and control of respiratory life support systems in normal and emergency situations. This bulletin, dealing with plant breathing air header and respiratory protective equipment, supersedes and combines P-0121 (Breathing Air) and P-0108 (Use and Maintenance of Respiratory Equipment).

II. SCOPE

This procedure covers the maintenance of good breathing air quality, as well as the selection, upkeep, and training in the use of respiratory equipment used in various parts of the plant.

The equipment and procedures specified in this bulletin are considered to be those required to maintain safe and healthy working conditions and to meet applicable government regulations.

III. RESPONSIBILITIES

This P-Bulletin has two major sections, IV. Breathing Air and V. Respiratory Systems. Each section has sub-sections on

Introduction
Responsibilities
Procedures
Training

Please refer to the appropriate section and sub-section for the specific information.

IV. BREATHING AIR

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1. Introduction

This procedure covers all users of compressed air used for personal breathing protection. Breathing air is supplied by a separate pipeline header system piped directly from the plant air compressors to the departments requiring air for breathing equipment. Departments requiring breathing air, but not connected to the breathing air distribution system, shall use cylinder compressed breathing air or other methods approved by the Loss Prevention & Safety Department.

This procedure does not cover the utility or instrument air systems except to state the UTILITY OR INSTRUMENT AIR SHALL NOT BE USED FOR PERSONAL BREATHING PROTECTION.

RESPIRATORY LIFE SUPPORT SYSTEMS

CAUTION MUST BE USED AT ALL TIMES TO AVOID CROSS CONTAMINATION OF BREATHING AIR WITH ANY OTHER SYSTEM.

2. Responsibilities

A. Air Supply

Department 984, the Compressed Air Department, is responsible for the supply of breathing air from the plant air compressors to the distribution header.

*** from pg 3.*

The plant Stores Department is responsible for maintaining an adequate cylinder supply of breathing air for purchase by units not using the plant header. The contents of each cylinder, on receipt, shall be checked for oxygen concentration. Analysis shall indicate $21\% \pm 1\%$ oxygen for acceptance. Accepted cylinders shall be tagged and signed by the individual who conducted the analysis.

The Purchasing Department shall not purchase cylinder air from a supplier other than the Linde Division of Union Carbide without prior approval of the Loss Prevention & Safety Department. A change in supplier shall first require a letter of quality certification acceptable to the Loss Prevention & Safety Department. Acceptance shall also be based on inspection of the supplier's cylinder filling facilities.

B. Pipeline

The Compressed Air Department is responsible for the breathing air distribution header up to the battery limits of using departments, or up to, and including, the first main block valve off the header. They shall safeguard the integrity of the distribution header system by a visual monthly inspection of the system. A written report will be made to the Department head.

ADDED TO

Using departments are responsible for piping systems from the header block valve and inside battery limits. Owners are responsible to see that the breathing air system is not contaminated from within an owner's system. They shall safeguard the integrity of the facility by using the breathing air system for personal breathing protection only. A monthly visual check, as per Procedure Bulletin P-0100, "Plant Safety Program," shall be conducted of in-battery breathing air lines. A written report will be made to the Department head. Owners are also responsible for conforming to installation and hose station standards

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PROCEDURE BULLETIN—TEXAS CITY PLANT P-0130

RESPIRATORY LIFE SUPPORT SYSTEMS

3. Procedure

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All tie-ins to the breathing air plant header must be approved by the manufacturing supervisor of the Compressed Air Department. Plant Engineering must be informed to keep distribution piping drawings up-to-date.

Breathing air shall be piped to personal protective breathing equipment hose stations only. All such hose stations shall use the male quick disconnect, MSA Model No. CS47371 single fitting or Model No. 47370 manifold. The above fittings, which match the standard issue breathing air supply hoses, are obtainable from Safety Supply. These quick connect fittings shall be used in breathing air systems only.

Please be aware that Thor fittings are to be used on nitrogen hoses and hose stations. Refer to Bulletin P-0126.

The breathing air system shall be identified according to the Texas City Plant color code procedure. The base color shall be blue and the stripe white. Each breathing air hose station shall also be identified by sign reading "Breathing Air" which is obtainable from the Stores Department.

The Loss Prevention & Safety section shall provide all breathing air protective equipment to the units. All equipment will be returned to Safety Supply by the units after use. In compliance with OSHA, masks are disassembled after use, and damaged parts are repaired. The masks are then thoroughly cleaned, inspected and sterilized. Finally, a signed inspection slip is placed along with the respirator or mask in a plastic bag and sealed.

The Loss Prevention & Safety section shall also provide:

- (1) Recommendations in selection and training.
- (2) Supervisory training necessary for the use of breathing air protective equipment.
- (3) Notification that an individual has medical limitations from industrial injuries.
- (4) Consultation concerning limitations of persons returning to work following non-industrial injuries or illness.
- (5) A room with a mildly contaminated atmosphere for testing and training.
- (6) Review and approve all training procedures in use throughout the plant.

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PROCEDURE BULLETIN—TEXAS CITY PLANT P-0130

RESPIRATORY LIFE SUPPORT SYSTEMS

4. Training

- A. Each using department or craft shall develop written standard procedures governing the selection and use of breathing air equipment in both normal and emergency situations. Standby men, safety harnesses and lines should be covered if applicable. These procedures must be reviewed and approved by the Loss Prevention & Safety Department.
- B. Each user shall be instructed and trained in the proper use of breathing air equipment and in its limitations. Adequacy of training shall be tested annually in a test atmosphere supplied by the Loss Prevention & Safety Department.
- C. All employees working in the departmental area will be instructed by competent persons. The instructions shall cover:
 - (1) Handling the breathing air equipment.
 - (2) Having mask fitted properly.
 - (3) Testing facepiece-to-face seals.
 - (4) Wearing equipment and working in a contaminated atmosphere (use test atmosphere provided by Loss Prevention & Safety).
- D. Every employee shall use the breathing air protection in accordance with the instructions and training received.

V. RESPIRATORY SYSTEMS

1. Introduction

Following are listed the various types of devices currently in use in the plant. Any new applications should be carefully considered and selection should be as a result of department supervision and Loss Prevention and Safety Department consultation.

A. Self Contained Breathing Apparatus

- (1) Airline Respirators. Full-face and half-face masks provide protection for those who must work for prolonged periods in harmful or objectionable atmospheres. They are not intended for use in atmospheres immediately dangerous to life or from which the wearer could not escape without respiratory protection.

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RESPIRATORY LIFE SUPPORT SYSTEMS

- (2) Scott Air Pak - Intended for short-term emergency work in contaminated atmospheres. Full face mask with a cylinder of compressed air approved for one-hour of continuous use when the cylinder is fully charged to 1980 psi. Safely used in any atmosphere except that which irritates or poisons through the skin such as HCN, concentrated ammonia, ACY, etc. For the latter applications, it can be used in conjunction with vapor proof suit, for short-term emergency work in the contaminated atmosphere.
- (3) Lear-Seigler Escape Mask. Mask is equipped with a small container of compressed air which will provide a five minute supply of breathing air. Because of the limited breathing air provided, use is limited to escape from contaminated atmospheres only.

B. Canister Type Masks. Three types, listed below, are commonly used and are available from Safety Supply. The canister contains a substance which either absorbs the harmful gas or vapor, or changes it into something which is relatively harmless. All canisters are limited to maximum harmful substance concentrations of 2% by volume in air except the GML which is good for a maximum of 1% by volume in air.

	Type	Color Canister	Usage
(1)	GMK	White, green stripe	Hydrocyanic acid gas (Dept. 19 working mask)
(2)	GML	White, yellow & grey stripe	Mercury vapor; toxic dust; chlorine. Max. of 1% by volume.
(3)	Type "N" Model SW	Red	Acid gasses, ammonia, carbon monoxide, organic vapors, hydrocyanic acid, and chlorine.

C. Cartridge Type Respirators

A cartridge type respirator is worn generally when there is a possibility of exposure to a very light concentration (1/10% max.) of a harmful or irritating vapor. As in the case of canister-type masks, there are various kinds of respirator cartridges for various exposures. The cartridges contain the same material that is found in the canisters. "Comflo" Respirators are presently in

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RESPIRATORY LIFE SUPPORT SYSTEMS

use in the plant. The cartridges are type GMA Organic Vapors and should be limited to use in atmospheres containing at least 19.5% oxygen and less than 1/10% organic vapors by volume.

D. Dust Respirators

A mechanical filter instead of a cartridge is used when exposure is to a dust which is irritating to the nose or throat or which may cause trouble in the bronchial tubes or lungs. The filter inserts may be replaced as they become clogged and restrict breathing.

E. Cloth Respirators

Use is limited to "nuisance" dusts, such as floor sweepings and do not have approval for protection against harmful dusts.

2. Responsibilities

A. Unit or Craft Supervision

CHG'D X
It shall be the responsibility of supervision to secure from the Safety Store the respiratory protective equipment most applicable and suitable for the purpose intended. Unit or craft supervision shall prepare written procedures covering safe use of respiratory protective equipment in dangerous atmospheres that might be encountered in normal operations or in emergencies. Supervision shall be responsible for training employees in the proper selection and use of respiratory protective equipment. Supervision shall discuss with Loss Prevention & Safety all process changes and make corrections in respiratory protective equipment as needed. Adequate and proper storage shall be maintained for unit needs. A minimum monthly inspection of all MASKS, RESPIRATORS, and SCOTT AIR PAKS shall be made and records maintained. Notify Loss Prevention and Safety if assistance is needed.

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B. Loss Prevention & Safety

CHG'D X
The Loss Prevention & Safety section shall provide all respiratory protective equipment to the units. All equipment will be returned to Safety Supply by the units after use. In compliance with OSHA, respirators and gas masks are disassembled after use, and damaged parts are repaired. The respirators or masks are then thoroughly cleaned, inspected and sterilized. Finally, a signed inspection slip is placed along with the respirator or mask in a plastic bag and sealed.

PROCEDURE BULLETIN - TEXAS CITY PLANT P-0130

RESPIRATORY LIFE SUPPORT SYSTEMS

CHGD. *
A log book will be kept in Safety Supply on the "Self-Contained Breathing Apparatus" and on Model SW canister masks as to location, date of issue and current status.

The Loss Prevention & Safety section shall also provide:

- (1) Recommendations in selection and training.
- (2) Supervisory training necessary for the use of respiratory protective equipment.
- (3) Notification that an individual has medical limitations from industrial injuries.
- (4) Consultation concerning limitations of persons returning to work following non-industrial injuries or illness.
- (5) A room with a mildly contaminated atmosphere for testing and training.
- (6) Review and approve all training procedures in use throughout the plant.

3. Procedure

A. Respiratory Equipment

- CHGD. *
- (1) Each unit shall examine work areas and evaluate possible exposure hazards and need for respiratory protective equipment. This evaluation shall be made independently by manufacturing, maintenance and safety departments.
 - (2) All respiratory equipment must be approved by the Loss Prevention & Safety Department. It shall normally be requisitioned through the Safety Supply.
 - (3) Written procedures shall be prepared, in each unit, covering the safe use of respirators in dangerous atmospheres that might be encountered in normal or emergency operations. Employees will be trained by their supervisors in the proper use of the equipment. Refresher training will be given annually. NOTE: The purpose of any protective mask is to isolate the wearer from the surrounding atmosphere, by providing a leak-tight seal between the mask and the face. Any condition which prevents a tight seal between the face and the mask will cause a leak. Therefore, persons subject to wearing masks will be prohibited from wearing excessive facial hair, such as long beards, heavy stubble, long hair or bushy sideburns which prevent a tight seal. Glasses should be removed before using full face masks because the temple pieces interfere with the mask and face seal.

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RESPIRATORY LIFE SUPPORT SYSTEMS

- CHG'D. X
- (4) Those individuals who must wear prescription eyeglasses to perform their work, and also are regularly required to use full face respiratory equipment, will be issued a full face respirator with special eyeglass inserts for their personal use. This equipment will be available from Loss Prevention & Safety at the specific request of the unit supervision.
 - (5) In areas where the wearer of a respirator could be overcome by toxic or oxygen deficient atmosphere, a standby person must be nearby with suitable rescue equipment. In case of emergency the standby man should sound an alarm and then begin rescue operations using self-contained breathing apparatus.
 - (6) Adequate and proper storage will be provided in the unit for all respiratory equipment.
 - (7) Respiratory equipment, stored in the unit, will be inspected monthly by operating personnel, per Procedure Bulletin P-0116, "Area Safety Inspections," and semi-annually by Safety Department personnel to assure that it is in satisfactory working condition.
 - (8) Used equipment will be returned to the Safety Store for reprocessing. Disposable dust respirators are to be discarded after one use.
 - (9) Gas mask canisters must be properly identified and the label must specify the atmospheric contaminants for which it offers protection.
 - (10) Each unit or craft supervisor shall keep current list of persons that are required to use respiratory equipment in the performance of their work. Update annually or when operating conditions change.
 - (11) Each unit or craft supervisor shall keep current list of persons that are temporarily not physically able to use respiratory equipment and perform the work so they will not be assigned these tasks. Update annually or when operating conditions change.

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ADDED →
B. RESPIRATOR FITTING

Training

- A. Each using department shall develop written standard procedures governing the selection and use of respiratory equipment in both normal and emergency situations.

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RESPIRATORY LIFE SUPPORT SYSTEMS

Standby men, safety harnesses and lines should be covered if applicable. These procedures must be reviewed and approved by the Loss Prevention & Safety Department.

- B. Each user shall be instructed and trained in the proper use of respiratory equipment and in their limitations. Adequacy of training shall be tested annually in a test atmosphere supplied by the Loss Prevention & Safety Department.
- C. All employees working in the departmental area will be instructed by competent persons. The instructions shall cover:
 - (1) Handling the respiratory equipment.
 - (2) Having respirator fitted properly.
 - (3) Testing face piece-to-face seals.
 - (4) Wearing equipment and working in a contaminated atmosphere (use test atmosphere provided by Loss Prevention & Safety)
- D. Every employee shall use the respiratory protection in accordance with the instructions and training received.

Written by Special
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