GEN 55 (REV.6/74)

Office Memorandum

(Name and Location) *As Listed	DATE February 28, 1978
(Name and Location) C. J. Schaefer and C. W. Whaley	REFERENCE NO. CJS-48-78, CWW-22-78



*Mr. E. L. Tejml
Mr. D. H. Miller
Mr. K. A. Dunn
Mr. W. F. Soward
Mr. L. E. Hackfeld
Mr. E. D. Luke

To conform with Company Occupational Health Policies and Guidelines (H. B. Bartley, February 13, 1978) effective March 1, 1978, the following additions should be added to the proposed BCP Industrial Hygiene Administrative Procedures. If no one objects, we plan to make these changes in the proposed A.P.'s.

1. Add the following to Hazardous Chemical Control section.

Physical, chemical, and toxicological data on new chemicals will be reviewed by the Plant Industrial Hygienist in sufficient detail to ensure that potential hazards associated with their use can be evaluated and adequate safeguards can be established to allow safe handling, use, and disposal. Safety data sheets should be obtained prior to purchase of any new chemicals.

A Company program called Hazard Review of Purchased Chemicals will go into effect July 1, 1978 and will be under the direction of the Chemical Company Manager, Industrial Hygiene and Toxicology. As part of the program, an approved list of chemicals and materials will be developed by the Company Industrial Hygienist with assistance from the plants and the Corporate Medical Department and approved by the Company Toxicological Review Committee. The list will be updated monthly. No new chemical will appear on the approved list unless it is listed in the Inventory List authorized under the Toxic Substance Control Act of 1977.

The Plant Industrial Hygienist will be responsible to insure that all new chemicals he approves are inputted to the list. Any new chemical which has the potential for posing a serious health risk due to its carcinogenicity, mutagenicity, or teratogenicity must be approved by the Company Toxicological Review Committee. The committee will act on request within 15 days of receipt.

2. Add the following section titled Employee Notification of Toxicological Test Results:

Any new toxicological data, either from Celanese sponsored studies or literature research, should be reviewed by the Company Toxicological Review Committee for validity and risk assessment. Employee notification should

be based on the recommendation of this committee. When a particular toxicological test shows that a chemical may pose a potential danger to employees, such information will be conveyed to all employees whose duties may place them in reasonable proximity to the substance. The intent is that such information will be conveyed as soon as possible after receipt of valid test results from an outside testing laboratory or from other reliable sources such as literature searches and other industry reports. In addition, corrective action planned to reduce employee exposure and risk will be communicated to employees. The time from discovery to disclosure is often set by Federal Regulations but should not exceed 30 days after review by the Company Toxicological Review Committee.

If a chemical poses an imminent hazard to employee health, the actual exposure levels will be established by the plant Industrial Hygienist. Work practices related to that chemical will be immediately reviewed by plant management and the Company Industrial Hygienist. Appropriate action will be taken to reduce exposure to an absolute minimum. The Toxicological Review Committee will be responsible for setting safe exposure limits.

When a chemical substance is identified as a significant risk, employees will be informed of such findings and of special programs to be initiated within the plant to protect employees from the possible hazard. These efforts will include review and/or revision of established work practices, protective equipment, and specific actions as may be required to assure safe working conditions from the standpoint of process operation and associated facilities.

C. J. Schaefer

C. W. Whaley

CJS/CWW/las