GEN 55 (REV.6/74)

Interoffice Memorandum

TO (Name and Location)	DATE
C. E. Steel	January 18, 1980
FROM (Name and Location)	**REFERENCE NO.**
L. R. Birkner, [redacted] J. D. Wilson, A. A. Miller	LRB-80-22 LRB-10, GV-120 JDW-49, AAM-06-80

PLAINTIFF'S EXHIBIT

CEL-1019

SUBJECT: Industrial Hygiene - Pampa Plant

On December 5 & 6 the following personnel participated in the Pampa Plant Industrial Hygiene Review:

M. Stenzel
L. Birkner
G. Vos
J. Wilson
C. Whaley
C. Loeffler
W. Tuka
S. Chisum
A. Miller
D. Chisum
K. Lombardozzi
J. Dougherty

Overall the plant's current procedures and practices protect the worker's health and contain the elements of a good I. H. Program. During the review, a number of items requiring action were identified and established as Action Items by the group. The agreed upon action items are described below.

1. A noise monitoring strategy has been developed. If sampling shows noise levels in excess of OSHA Standards, a hearing protection and conservation program and administrative procedure will be developed immediately. The program will define responsibilities of the IH, IR, and engineering functions in documenting and implementing various phases of the program.

2. Capital expenditures such as engineering controls, process modifications, etc., to control employee exposure should be lined out on the capital plan as IH items.

3. An administrative procedure will be written to document the existing radiological health program, relative to the use of X-Ray sources by contract personnel on the plant site.

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4. The Industrial Hygiene AP will be modified to include industrial hygiene responsibility during emergency situations and upset conditions. Such procedures should include documentation of exposed employees and materials involved. Where feasible and appropriate, exposure data should be collected.

5. Two items were identified under the Health Surveillance Program which require upgrading. These include:

   a) Procedures for biologic monitoring during exposure excursions where appropriate.

   b) Procedure to insure that the Facility Nurse reviews all dispensary reports and communicates to the IH incidents involving adverse effects from chemical exposure.

Comment:

The plant respiratory protection AP and implementation program have been reviewed and found to be satisfactory. The program will provide adequate employee protection where engineering controls are not feasible and will bring the plant into complete compliance with OSHA regulations 29 CFR 1910. 134.

The Celanese Chemical Company, Inc., Department of Industrial Hygiene and Toxicology, the Corporate Department of Environmental, Health and Safety Affairs, and the Corporate Law Department will be informed of the progress in these areas on a quarterly basis.

L. R. Birkner
Celanese Corporation

G. Vos
Celanese Chemical Company, Inc.

J. D. Wilson
Pampa Plant, IH

A. A. Miller
Pampa Plant, I. R. Manager

LRB/GV/JDW/AAM:tg

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cc: W. H. Tuke - Pampa
C. D. Barrett - Dallas