

Interoffice Memorandum

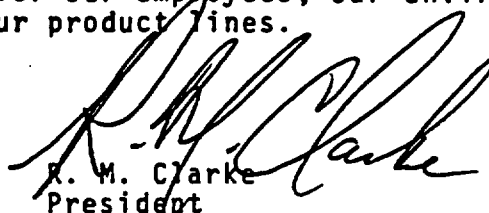
TO (Name and Location) CSO General Managers	DATE September 25, 1984
FROM (Name and Location) R. M. Clarke	REFERENCE NO. RMC 84-301

Subject: CELANESE SPECIALTY OPERATIONS ENVIRONMENTAL,
HEALTH AND SAFETY POLICY MANUAL

Celanese Specialty Operations is committed to the Celanese Quality Policy of delivering products and services that conform exactly to requirements. Environmental, health and safety concerns are integral to those requirements and doing our jobs right the first time.

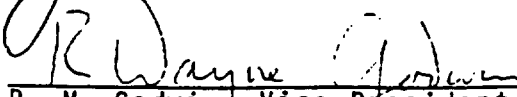
The attached policies outline performance standards for use by operating management in developing and maintaining internal business unit practices and procedures. They were developed with input from the Corporation, CSO staff and business unit line management. Implementation will assure conformance to current and evolving requirements of law and government regulation.

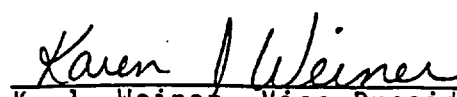
These are demanding standards which we believe represent a necessary level of protection for our employees, our environment, our capital assets and our product lines.


R. M. Clarke
President


J. M. Lauer, Exec. Vice President
Performance Polymers & Chemicals


C. G. Weaver, Vice President
Human Resources


R. M. Godwin, Vice President
Advanced Materials and New
Business Development


K. J. Weiner, Vice President
and General Counsel


D. L. Lisman, Director,
Quality Management


T. J. Welsh, Vice President


S. R. Verdile, Vice President
and Controller


D. H. Miller, Director Environ-
mental, Health & Safety Affairs

Environmental, Health & Safety Affairs

Policy Manual

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CELANESE SPECIALTY OPERATIONS (CSO) POLICY SUMMARY

CSO is committed to the **Celanese Quality Policy** of delivering products and services that **conform exactly to requirements**. **Environmental, health and safety concerns** are integral to meeting those requirements and doing our jobs **right the first time**.

We at Celanese are committed to environmental, health and safety protection for our employees, customers, neighbors and others who may be affected by our products or activities. We will comply with all applicable laws and regulations. In addition, we are committed to five basic principles:

- We will provide our employees with a **safe workplace**.
- We will **design and operate** our facilities to minimize adverse impact on public health and the environment.
- We will **promptly communicate** to affected persons the known hazards of our products and activities and the methods necessary for safety and health protection.
- We will produce and sell only products that can be manufactured, used and disposed of safely.
- We will use **good science** to define and manage all significant risks arising from our products or activities.

It is our policy that each business unit operate by the principles embodied in the "Celanese Corporation Environmental, Health and Safety Policies" by implementing these CSO policies for all U.S. based operations.

These **Policies** outline the performance standards **for use by operating management** in developing internal business unit procedures. As such, they provide the **basis for the CSO audit program**.

- Each business unit will review their existing operating instructions and procedures to determine and assure conformance to these policies.
- Business unit management will ensure that employees at all levels are made aware of these policies and participate in their implementation.
- The CSO Environmental, Health and Safety Affairs (EHSA) group will develop and maintain **professional reference manuals** of tried and proven industrial practices in the areas of safety, medical, environmental and industrial hygiene. These manuals will provide a Library resource of **model practices** which business units may use in developing their specific procedures and operating instructions. The reference manuals will be developed in consultation with respective business units and content is subject to approval by the Director, CSO EHSA.

We will also maintain an awareness of Celanese-wide hazard management policies and practices and will assure appropriate coordination of all policy actions which may be reasonably believed to be of Corporation-wide significance in potential for environmental or health protection and/or exposure to adverse publicity or liability. Responsibility for such coordination rests with the CSO Director, Environmental Health and Safety Affairs, acting through the **Celanese Corporation's Hazard Review Committee (HRC)** consisting of the Corporate EHSA Director (who will serve as Chairman), the respective operating company Directors, and the Corporate General Counsel.

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GENERAL POLICIES

COMPLIANCE ASSURANCE (INCLUDING AUDIT PROGRAM)

The maintenance of an acceptable **audit program is an important responsibility** of CSO which is **shared by operating management** of all business units. This responsibility will be executed with regular audits by CSO staff. Periodic, but infrequent, corporate audits will be conducted as a backup.

Line management in each business unit should conduct self audits of the effectiveness of the programs at their facilities, in addition to the periodic division audits.

Generally, the CSO division audit plan will meet these criteria:

- REVIEW
 - Each of the 5 EHSA disciplines
 - Every 1-2 years, each facility; the frequency to depend on a yearly management review of various factors affecting the particular facility
- INCLUDE
 - Onsite review and inspection by CSO EHSA staff members of operating facilities, activities and records against these policies, existing laws and regulations, and consensus standards of professional judgment
 - Facility program review
 - Review with operating management of effects of proposed (or anticipated) regulations
 - Written listing, along with any appropriate suggestions, on all items of consequence for review with the facility manager at the conclusion of the visit
 - A business unit commitment published in the form of action plans in response to audit findings, by the facility manager, to the general manager within four weeks of the audit
 - Acknowledgment by the auditor that the business unit commitment reasonably addresses any compliance shortfalls
- Business unit operating management is responsible for followup of all audit items, including appropriate line management communications; and, will report each calendar quarter on progress to the business unit General Manager, the CSO General Counsel, the auditor and the Director, CSO EHSA, until all identified compliance shortfalls are corrected.
- CSO staff will periodically report on significant audit findings and followup items to corporate staff.

Each December, the respective business unit general managers will, with consultation of the CSO General Counsel and the Director, CSO EHSA, send letters to the President, CSO, stating that he/she is aware of the policies and assuring compliance. Significant exceptions will be appropriately noted. **The President, CSO, will then report the compliance status** as reflected in these line management communications to the Celanese, Chief Executive Officer.

008703

EMERGENCY PREPAREDNESS

Each Celanese operation will establish and maintain an **emergency response program** that provides for control of situations arising out of fires, explosions, natural disasters, accidents, spills, medical, environmental or other potentially significant emergencies.

- Each facility will periodically perform **risk assessments** to determine the potential for emergency situations and, as appropriate, take positive steps to prevent such incidents and to minimize their potential impact.
- Each operating facility is expected to have a written emergency response plan, appropriate to the risks involved at that facility.
- In particular, where hazardous wastes or oil are on site, such facilities will have spill plans that address releases of oil, hazardous chemicals and hazardous wastes. Reporting under CWA 112, Section 311, CERCLA, NPDES, RCRA and local air regulations should all be addressed.
- **Emergency response teams**/personnel must be **trained and performance tested** with appropriate practice drills, to perform at the level of response expected and, where practical, be assigned specific duties.
- Each significant incident will be promptly reported. **See Incident Reports** under CSO Policy—Page 4.
- Emergency medical care should be in accordance with pre-arranged procedures where possible.

008704

INCIDENT REPORTS

Effective management of environmental, health and safety affairs requires prompt line management and support group **awareness** of significant abnormal occurrences.

The operating company management is responsible for the **prompt internal reporting** of significant incidents.

- Environmental, health or safety incidents involving Celanese will be deemed significant whenever they cause or have the potential for:
 - \$50,000 damage
 - fatality or serious injury
 - significant damage to the environment, or
 - significant media coverage
- Such significant incidents will be communicated promptly to the Director, CSO Environmental, Health and Safety Affairs, who will then be responsible for appropriate notification to those who provide staff support within and without CSO.
- Line management is responsible for appropriate communications by line up to and including the President of CSO.

A confirming telex providing the fact basis on any such loss will be sent addressed to the respective business unit Financial Manager, and the CSO Vice President responsible for EHSA, with copies to:

- | | |
|-----------|---------------------------------|
| CSO | — Business Unit General Manager |
| | — Director, EHSA |
| | — Controller |
| | — General Counsel |
| Corporate | — Director, DEHSA |

Communications to the public involving environmental, health and safety issues related to any incident will, to the extent feasible (e.g., allowance for unforeseen emergency situations), be limited to published Celanese information (e.g., MSDS, product literature).

- All prepared statements to the media or to the public following an incident will be subject to legal and professional environmental, health and safety review and approval.
- Statements on actual toxic effects, observed in connection with an incident, are subject to approval by the Corporate Director, Toxicology, and, in the case of human exposure, also by the CSO Medical Director.

Any incidents which are reported to a government agency will also be promptly reported to the EHSA staff.

Abnormal occurrence logs which include, in particular, near-miss situations are valuable tools for ongoing local evaluation of the effectiveness of programs. Where such records are maintained, normal procedures should provide for regular line management review and for documentation of the fact basis of each incident along with actions taken or followup proposed.

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REVIEW OF CAPITAL PROJECTS

Within CSO, it will be the responsibility of the ultimate business unit line management RFA signatory to assure that each RFA is critically reviewed and that there has been a professional review of environmental, health and safety implications. All significant issues will be accommodated and documented in the RFA.

For RFAs requiring the CSO President's approval, the submitting business unit **General Manager will critically review the potential** for safety, health or environmental impact and, if significant, assure appropriate review by the Director, CSO EHSA.

RFAs which require corporate approval are subject to corporate DEHSA review prior to approval by the Corporation.

CONTRACTOR SERVICES

Celanese will do business **only with contractors who provide reasonable assurance** that services performed for Celanese will be carried out in compliance with all applicable laws and regulations.

Each business unit will have procedures for managing the various types of contractors' services according to Celanese policy.

- Affected "contractors" include, but are not limited to, construction, maintenance, medical, industrial hygiene, engineering, tollers, custom manufacturing, waste disposal, product testing, warehousing and packaging facilities.
- All contract services performed on Celanese sites will be performed in reasonable compliance with Celanese policies.
- Business units will evaluate all offsite contractor services, and where significant environmental, health or safety risks are uniquely presented by the conduct of business for Celanese, will require that the contractor assures his compliance with regulations, law and applicable Celanese policies.
- Business units have the primary responsibility for inspecting offsite contractor's facilities prior to use and for appropriate re-inspections (e.g., hazardous waste sites should be inspected annually). CSO EHSA will assist with such contractor evaluations and audits where appropriate. Reports of inspections will become part of the permanent record.
- Written contracts or formal purchase orders are to be used for all arrangements with contractors. Where significant Celanese liability can reasonably be expected to accrue from non-performance, such documents should be reviewed by CSO legal and EHSA staffs.
- Business units will supply contractors with appropriate environmental, health and safety information to help minimize risks presented by contractor services.

008706

USE OF CONSULTANTS AND EXPERT WITNESSES

Consultants and expert witnesses will be used, as required, with the understanding that they are **limited to the role of technical advisors** of Celanese and are not to be solely relied on for management review of their own work or for Celanese management decisions.

- The selection of a consultant or expert witness will normally be the responsibility of the affected business unit. Significant environmental service contractors must be approved by the CSO Manager, Environmental Control. Medical and toxicology consultants must be approved by the CSO Medical Director and the Corporate Director of Toxicology, respectively.
- The technical agent status places clear responsibility on the business unit contracting for such technical help to be assured of the technical content and factual accuracy of any reports. Consultants will be required to submit a draft of any report for review and comment prior to their publication. A followup responsibility exists to promptly address all recommendations which might ultimately affect Celanese liability and document the action taken.

RECORDS RETENTION

The business units will have procedures to assure that **records** relating to environmental, health and safety issues and programs are **maintained in an orderly and efficient manner** for operating management and to allow for review, retrieval and investigation.

All environmental, health and safety records will be retained as required by law and regulation, with the further presumption that **significant records will be kept permanently**, or until a management decision is made under this policy and approved by the CSO General Counsel that retention is no longer necessary. Examples of records kept permanently are:

- Waste Disposal
- Employee Medical Records
- I.H. Monitoring Data and Interpretation
- Toxicology Studies
- Underground Tank Management
- FDA and Agency Approvals
- Groundwater Studies
- Audit Records

When any business unit is closed down or sold, it is the responsibility of the respective line management to provide the CSO EHSA Group with complete environmental, health and safety records. In the case of individual employee medical records, the CSO Medical Director will direct the handling in a fashion that assures confidentiality of these records.

008707

ENVIRONMENTAL, HEALTH AND SAFETY AFFAIRS PUBLIC POLICY POSITIONS

Celanese encourages **participation in legislative and regulatory processes on a coordinated basis** by a line management, knowledgeable of Celanese interests, public positions and policy.

Corporate DEHSA will take the coordinating lead in influencing national issues.

- To assure maximum effectiveness, normally, only one submittal will be made to a government agency by Celanese Corporation on a given policy issue.
- The CSO EHSA Group will coordinate the input and participation from affected business units in the development of positions on national issues.
- All public positions are subject to approval by the Celanese Corporation Government Affairs Committee.
- Corporate DEHSA will coordinate trade association activity at the Federal level, however, CSO and business unit staffs are encouraged to actively participate in such national associations.

The CSO EHSA Group will take the coordinating lead in the monitoring and influencing of state and local governments where more than one business unit is involved.

- The business units will keep CSO EHSA advised of development of significant local issues.
- Each business unit will, as appropriate and in consultation with CSO EHSA, take the lead in state and local affairs where it is the only Celanese entity affected.
- The business units will advise CSO EHSA of their participation in regulatory or trade association activity to allow coordination, where appropriate.

008708

REGULATORY AGENCY CONTACTS

Dealings with **government agencies** should be viewed as potentially **having the force of law** and, therefore, require a certain level of formality.

- Submittals to any government agency will be signed by the appropriately designated line manager (normally, the affected facility manager), or a member of CSO staff.
- All verbal contacts with regulatory officials on the subject of Celanese compliance will be documented.
 - All agency inspections will be documented by Celanese. Copies of any agency reports will be secured by the facility inspected and a copy forwarded to CSO EHSA.
 - CSO EHSA will be notified promptly of inspections.
 - Inspector credentials are to be verified and the inspector is to be accompanied by a designated plant representative while on site.
- Commitments to a government agency which could reasonably be expected to result in unbudgeted expense or unapproved capital, shall have the prior review and approval of the applicable line management signatory to the resulting budget or RFA.
- All information submitted to a government agency involving confidential business information will be subject to appropriate business unit and legal review, will be properly identified, and will be accompanied by an appropriate confidentiality claim.
- Written submittals or verbal commitments to a government agency shall have the prior review of Celanese Legal Counsel. (Approval will be coordinated by CSO EHSA).
 - Legal approval is not required for routine submittal of facts (e.g., monitoring reports, annual reports) to an agency where no significant compliance issues or questions exist.
- Use of outside legal counsel should be minimized and should have the prior approval of either the CSO Law Department or the Corporate Associate General Counsel.

008709

SAFETY & LOSS PREVENTION

SAFETY COMMITMENTS

Celanese Specialty Operations management believes that **accident and injury prevention are of the highest importance**. Our objective is to provide a safe working environment to prevent injuries and illnesses to our employees and other personnel in our facilities. We will do this by good facility design and equipment selection, ensuring qualified and properly trained personnel, providing necessary personal protective equipment and providing good safety policies and procedures.

Working safely is a personal responsibility and all employees are expected to perform their jobs in a manner that will not injure themselves or anyone else. No job is so important that time cannot be taken to do it safely—the first time.

All supervisory personnel have as a fundamental part of their duties, a responsibility and accountability for the identification and elimination of work hazards, the training of subordinates in proper use of equipment and safe working practices, the development of safety consciousness and securing the full cooperation of employees for the attainment of safety performance.

LOSS PREVENTION

To minimize loss potential, each business unit will establish and maintain a loss prevention and protection program that includes design and periodic Process Hazard Reviews, emergency equipment properly maintained, and trained emergency personnel.

Each business unit will establish and maintain a security program for its facilities that controls access to facilities and protects documents and assets. (Ref.: Celanese Corporation Controller's Manual: CM 30-1).

TRANSFER OF CELANESE HAZARDOUS MATERIALS

Transfer of Celanese hazardous material to employees or to any individual or organization is prohibited except where the transfer occurs through an acceptable Celanese sales agreement.

- Under no circumstances will Celanese empty drums be sold or disposed of to other than a drum reclaimer company or a disposal company, permitted to dispose of such drums.
- Any item (e.g., salvaged equipment) previously contaminated with hazardous material shall be cleaned before disposal or treated as a hazardous material.

ACCIDENT INVESTIGATION AND RECORDS

All accidents, fires, near misses, etc., will be investigated by the owning business unit and reported promptly (see Incident Reports, Page 4).

- The team investigating accidents involving fatalities, multiple serious injuries and/or damage exceeding \$250,000 will include the CSO Manager, Safety and Loss Prevention.
- Celanese will maintain records of accidents for monitoring safety performance. Such records will be reported periodically to the Manager, Safety and Loss Prevention.
- Current guidelines (Ref.: CSO Model Safety Practices, Reference Manual) will be followed to assure **consistency of safety statistics** within and among Celanese operations.
- Any incident resulting in a chargeable lost time accident will be promptly reported in writing to CSO management with a copy to the Manager, Safety and Loss Prevention.

SAFETY EVALUATION AND RECOGNITION AWARDS

Each year during February, the **President's Safety Committee will evaluate** safety and loss prevention records and programs. **CSO safety performance** will be reviewed and a determination made as to which business units and facilities have, by their performance, best contributed to our commitment to safety and loss prevention. The outstanding performers will be eligible for recognition by being named as recipients of one or more of the following awards:

- Celanese Specialty Operations' Harold Blancke Safety Contest Finalist Award
- Celanese Specialty Operations' President's Award for Safety Performance

The business units are encouraged to conduct additional award programs to promote and encourage excellence in safety performance.

EMERGENCIES RELATED TO TRANSPORTATION OF HAZARDOUS MATERIALS

Each business unit will assure that its products are packaged and transported in a manner that reasonably assures transportation safety.

Business units trans-shipping significant quantities of hazardous materials must have a **Transportation Emergency Response Plan**. The respective business unit plans will vary in detail depending on the hazards and common mode of transportation of the products and raw materials involved.

The Transportation Emergency Response Plan will provide for prompt communication from the scene of any transportation emergency incident involving Celanese products or transportation equipment to an appropriate business unit person who, in turn, can provide needed coordination and/or emergency information. The plan will also provide for prompt reporting to government agencies as required by laws and regulations.

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As an adjunct, the plan must provide **accurate information** to key management personnel **on a “need to know” basis**. This will include prompt, internal reporting of any significant spill, leak, fire, exposure or accident involving any Celanese product external to the plant to:

- the CSO Manager, Safety and Loss Prevention
- or the Director, CSO EHSA (back up)

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ENVIRONMENTAL

ENVIRONMENTAL DISCHARGE LIMITS

CSO places high emphasis on our responsibility to **identify, prevent and control** any significant potential **environmental hazards** at each facility.

- Each facility will **evaluate** their air emissions, waste water discharges and solid wastes on a regular basis so as to identify any **potential** for significant **impact** on public health or the environment.
- Whenever actual or potential discharges present a significant potential hazard, the business unit will conduct a risk assessment to **establish measures**, including environmental discharge and/or other process control limits **adequate to prevent** such adverse impact.
- The CSO EHSA staff will maintain the capability to perform environmental risk assessments.
- All risk assessments of corporate-wide significance are subject to review by the Celanese Corporation Hazard Review Committee.

HAZARDOUS WASTE CONTROLS

Operating management has the ultimate responsibility for maintaining compliance with Federal, State and local hazardous waste regulations.

- Hazardous waste sites will be inspected yearly.
- Facilities will use disposal methods or off-site contractors which have been approved by the CSO Manager of Environmental Control.
- Non-RCRA hazardous wastes should be disposed of in a similar manner to RCRA hazardous wastes where it can be reasonably projected that significant risks could be encountered by their disposal in local solid waste landfills.
- Business units will evaluate, and wherever practical, change operations to eliminate, recycle or reuse wastes in preference to continued land disposal.

GROUNDWATER PROTECTION

Business units have an important responsibility to implement and maintain **effective groundwater protection programs**.

- **Risk assessments** will be performed on facility activities to determine potential for impact on groundwater. The CSO Manager, Environmental Control, will be a member of the risk assessment team.
- Each facility presenting a risk of significant adverse impact on the quality of groundwater, will adopt a groundwater protection program adequate to minimize such adverse impact. This program will include:
 - a hydrogeological study performed on the site
 - if the groundwater risk assessment justifies it, a groundwater monitoring program instituted and maintained by the facility
- CSO recognizes the special vulnerability caused by underground tanks and will avoid their use whenever practical. Where underground tanks are used, formal risk assessments will be conducted and appropriate precautions on design and monitoring will be taken.

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PRODUCT SAFETY

Each business unit will establish, maintain, and operate a **professional product safety program** to ensure that its products will not pose unreasonable risks to human health or the environment. The core elements of the business unit program will include the following:

- An identified **business unit product safety contact** selected in consultation with the CSO Product Safety Manager.
- A **Product Safety Committee**, commissioned by the General Manager, with a written Charter that defines the intent and function of the product safety program, and has appropriate representation from the business unit, the CSO Product Safety Manager, and provides for participation of the Corporate Toxicology Director, Corporate Product Safety Director and the CSO Law Department.
- A **Product Safety Approval Request (PSAR)** procedure that assures adequate data collection, professional risk assessments and a critical management review with appropriate business management approvals to support each stage of new product or significant new use development (experimental, developmental, and commercialization stages). Commercial PSARs require review of the risk assessments and a written recommendation by the business unit Product Safety Committee for approval by the General Manager and the CSO General Counsel.
- A **Substantial Risk Procedure** which includes a designated business unit contact, all necessary training and education of employees, and prompt reporting of TSCA, 8(e) reports to the CSO EHSA Director for evaluation by the Corporate Hazard Review Committee (HRC).
- Consultation with and approval by the Director, CSO EHSA for significant new communications of environmental, health and safety information.
- Current **Material Safety Data Sheets (MSDSs)** for all articles and chemical products with potential health or physical hazards and which are made available to affected employees, customers, contractors and carriers.
- Annual evaluation of MSDSs, labels and product literature to assure accuracy and consistency.
- Annual review of toxicology programs coordinated through the CSO Manager, Toxicology, and in consultation with the Corporate Director of Toxicology.
- **Testing** appropriate to support risk assessments, MSDSs, labels and product literature. All toxicology testing will be under the direction of the Corporate Director of Toxicology and subject to his approval.
- Approval from Corporate Toxicology on all interpretations of toxicological data.
- Communication of epidemiology studies and significant new toxicological data to employees and, as appropriate, to customers and contractors.
- A current **chemical substance inventory** which is reviewed to assure compliance with applicable sections of the Toxic Substances Control Act (TSCA) and is accessible to the CSO Manager, Product Safety, Toxicology and Industrial Hygiene for monitoring and coordination of New Substantial Risk and other reviews.

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INDUSTRIAL HYGIENE

The **CSO Industrial Hygiene Program** is a **critical** line of defense in protecting Celanese employees from hazards in the operating environment.

Each business unit will establish, maintain, and operate **a professional** industrial hygiene (I.H.) program to anticipate, recognize, evaluate and control occupational exposure to chemical, physical, biological, and ergonomic hazards. The core elements of the business unit industrial hygiene program will include the following:

- An identified business unit **industrial hygiene contact** at the business unit headquarters and at each of its facilities, selected in consultation with the CSO I.H. Manager.
- **Direction of an Industrial Hygienist**, certified by the American Board of Industrial Hygiene (ABIH), to assure professional overview of the I.H. Program. The CSO industrial hygienist will maintain this certified status.
- A **current chemical substance inventory** which is accessible to the CSO Industrial Hygienist for I.H. program evaluation and coordination of new hazards information.
- An **evaluation of** chemical, physical, biological and ergonomic **hazards** associated with processes and/or job tasks for program priority-setting and for setting of Permissible Exposure Limits (PELs) where necessary, to protect the safety and health of employees or other affected groups. PELs require Celanese Hazard Review Committee approval.
- Written I.H. sampling objectives to accurately determine exposure levels and an evaluation strategy which employs statistical analysis of the data.
- A sampling and analytical methods validation program based on field and laboratory data.
- A **quality assurance program** which addresses industrial hygiene measurement tools, sample integrity, the analytical laboratory, and the methods validation program.
- A hierarchical approach to control that employs the use of engineering and administrative controls in preference to personal protective equipment or relocation of employees.
- A **recordkeeping system** for storing and retrieving I.H. data to be used in compliance, control, and estimating worker exposure and which is readily accessible to the CSO Industrial Hygienist.
- Communication of industrial hygiene sampling results to employees.

MEDICAL

EMPLOYEE HEALTH PROGRAM SUMMARY

Celanese Specialty Operations' business units will establish and operate an **employee occupational health monitoring program** which complies with laws, regulations and Celanese Specialty Operations' Policy.

Each business unit will maintain the necessary procedures in place to identify needs and, in consultation with the CSO Medical Director, provide the resources required for appropriate occupational health monitoring, evaluation, medical care and epidemiology.

Core elements of the business unit occupational health monitoring program are:

- **Direction** by a **Celanese employee** who is a **physician** with appropriate specialty board certification and medical licensure, to assure professional overview of the employee health monitoring program. The Medical Director will maintain these professional credentials.
- Selective surveillance of employee health through a medical examination program based on job risk categories.
- **Records and data management** systems which allow monitoring and direction to assure the overall effectiveness of the health monitoring program by the Medical Director.
- An **epidemiology program** appropriate to assure that Celanese activities are not having an unfavorable effect on employee health and when determined necessary by business unit management, in consultation with the Medical Director, to provide data valuable in assessments regarding other potentially affected groups.
- **Qualified medical personnel** with suitable occupational health guidance available to each operating facility.
- Procedures to maintain **confidentiality** of medical results on individuals and for proper communication of results of epidemiology studies.

Celanese will also undertake other medical programs, where determined beneficial by the business unit, in consultation with the Medical Director.

MEDICAL EXAMINATIONS

All prospective employees will undergo a standard **pre-employment examination** as a condition of employment. **Periodic examinations** will be offered to occupationally exposed employees commensurate with their occupational risks. Certain components of the examination may be mandatory depending on requirements of public law and company or business unit policy.

The protocol for each category of examination will be established by each business unit in consultation with the Medical Director.

Other periodic examinations may be offered in order to implement approved preventive medicine programs. The recommendation, development and determination of the effectiveness of specific programs will be an ongoing activity of the CSO Medical Director in consultation with corporate and operating group medical directors.

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The health professional maintaining the records will keep them in a form such that they may be conveniently abstracted, as required, for the following purposes:

- **Monitoring of the overall effectiveness** of health and safety programs.
- **Epidemiological studies** of exposure and control groups—Such studies will be proposed in consultation with the corporate and operating company medical directors. All epidemiology studies will require the approval of the Director, CSO EHSA, and the respective business unit general manager.
- Conduct of medical audits.

The business units and the Medical Director have a **joint responsibility for quality control** of all abstracted data.

DETERMINATION AND COMMUNICATION OF OCCUPATIONALLY SIGNIFICANT MEDICAL AND HUMAN EFFECTS INFORMATION

A **periodic review** of employee group data will be undertaken by each business unit in consultation with the CSO Medical Director in order to assure prompt awareness and appropriate action, should occupationally significant results develop from the health surveillance programs.

Physicians' reports to the business management will be limited to occupationally significant results. Such reports to business management will include:

- The report of pre-employment examination which will include a summary of the physical, performance and medical limitations for the purpose of safe job placement.
- The report of periodic examinations which should identify occupationally related changes for the purpose of remedial action.
- The report of exit examination which should identify occupationally related changes or new limitations for job placement, if any.

The business units will develop procedures for informing individual employees and groups of employees of the medical and human effects from individual or epidemiological studies, significant new toxicological data and other studies.

EMERGENCY MEDICAL CARE

Each business unit will prepare appropriate **emergency medical plans** for its facilities, identifying procedures, key personnel, **occupational risks unique** to the business unit and medical care organizations in the local area to meet the following contingencies:

- Significant or life threatening illnesses occurring on the job.
- Medical care support for accidental injury.

Incidents of acute chemical exposure which result in a lost time accident and/or any occupational exposure which results in death, in hospitalization, or in lost time of more than seven days should be promptly reported by the business unit manager, or his designee, to the CSO Medical Director.

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Interoffice Memorandum

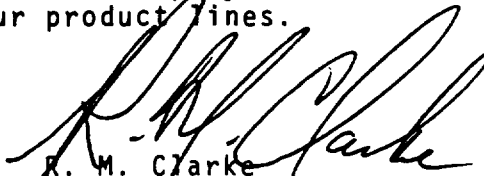
TO (Name and Location)	DATE
CSO General Managers	September 25, 1984
FROM (Name and Location)	REFERENCE NO.
R. M. Clarke	RMC 84-301

Subject: CELANESE SPECIALTY OPERATIONS ENVIRONMENTAL,
HEALTH AND SAFETY POLICY MANUAL

Celanese Specialty Operations is committed to the Celanese Quality Policy of delivering products and services that conform exactly to requirements. Environmental, health and safety concerns are integral to those requirements and doing our jobs right the first time.

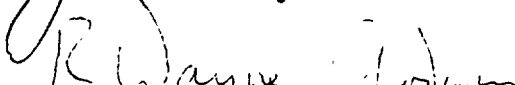
The attached policies outline performance standards for use by operating management in developing and maintaining internal business unit practices and procedures. They were developed with input from the Corporation, CSO staff and business unit line management. Implementation will assure conformance to current and evolving requirements of law and government regulation.

These are demanding standards which we believe represent a necessary level of protection for our employees, our environment, our capital assets and our product lines.


R. M. Clarke
President

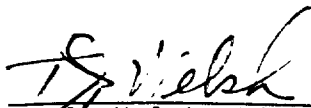

J. W. Lauer, Exec. Vice President
Performance Polymers & Chemicals


C. G. Weaver, Vice President
Human Resources


R. M. Godwin, Vice President
Advanced Materials and New
Business Development


K. J. Weiner, Vice President
and General Counsel


D. L. Lisman, Director,
Quality Management


T. J. Welsh, Vice President


S. R. Verdile, Vice President
and Controller


D. H. Miller, Director Environ-
mental, Health & Safety Affairs