

ADMINISTRATIVE PROCEDURE

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I. INTRODUCTION

Celanese is committed, as stated in Administrative Procedure AP-1-29, to protect its employees, their families and their potential offspring, from adverse health effects due to occupational exposures. This Procedure is issued to implement these objectives in all Celanese facilities. The scope of this Procedure includes reproductive hazards, fetotoxic effects, sex-specific health effects, and any other short-term or long-term occupational health problems.

This Procedure does not define key terms such as reproductive hazards, significant adverse health effects, safe exposure level, and unusually susceptible individuals. It is the intention of the Procedure that professional judgment be exercised in these areas based on valid scientific evidence. It is also recognized that flexibility is needed in responding to new scientific data and changing public perceptions of risk.

II. DETERMINATION OF HAZARD

- A. Each Operating company has the principal responsibility to determine workplace exposure to and hazard from all suspect substances and agents. The Department of Environmental, Health and Safety Affairs (DEHSA) will assist the operating companies by provision of industrial hygiene, safety, toxicology and medical support where necessary.
- B. DEHSA will disseminate to the operating companies information from government reports, toxicity studies and other literature on materials which are suspected of causing adverse health effects. Operating companies are responsible for sending similar information to DEHSA for dissemination to other operating companies as appropriate.
- C. When DEHSA or an operating company has evidence that exposure at existing plant levels in the absence of a standard or at the current governmental or corporate level may present a significant hazard to employees, their families or their potential offspring, a Hazards Review Committee (HRC) shall be convened to define and recommend appropriate action to operating company management.

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III. HAZARDS REVIEW COMMITTEE (HRC)

- A. Each operating company should establish procedures for an operating company HRC. The HRC will be composed of representatives of the following groups:

Operating Company (preferably including
Industrial Hygiene, Employee Relations
and Manufacturing)

DEHSA
Law Department

Each group can designate its own representatives, in any number, to the HRC.

- B. DEHSA will determine which operating companies are affected and convene the initial meeting. Where only one operating company is affected, the HRC will be chaired and operated under that company's procedures. Where more than one operating company is affected, the HRC will be chaired by the Director of DEHSA and operated under this Procedure.
- C. Operating company and DEHSA representatives should compile all available data on toxicity, exposure levels and feasibility of engineering and administrative controls prior to the HRC meeting.
- D. The function of the HRC will be to take the following actions:
1. Determine whether a safe exposure level for some or all employees (considering effects on the employees, their families and potential offspring) can be defined.
 2. If a safe exposure level can be defined for all employees (i) recommend an appropriate exposure level for all affected operations, (ii) where possible recommend a timetable for implementation of feasible engineering and administrative controls, and (iii) indicate whether personal protective equipment is necessary pending installation of such controls.

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3. If a safe exposure level can be defined for some, but not all, employees, recommend an appropriate exposure level for the general workforce and recommend identification of those employees who are unusually susceptible to the adverse effect and thus not adequately protected by the recommended exposure level.
4. If a safe exposure level cannot be defined, recommend appropriate testing to allow such definition and suggest prudent interim actions based on the quality and implications of the existing data.

IV. IMPLEMENTATION OF EMPLOYEE HEALTH PROTECTION

- A. Where current exposures exceed the recommended exposure level, control measures should be implemented, in the following order:
 1. Affected employees should be promptly informed by the operating company of the toxicity data and action which is being taken. Each operating company should establish and follow its own dissemination procedures, including prior review of toxicity statements by DEHSA and the Law Department.
 2. Engineering and administrative controls should be used first, to the extent feasible, to attain the recommended exposure level. Each operating company should develop a timetable for implementing such controls.
 3. Where feasible engineering and administrative controls do not attain recommended exposure levels, personal protective equipment should be provided to, and required to be used by, exposed employees. Employees who are required to use such equipment should be trained in its proper use.

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4. Where the recommended level defines a safe exposure level for some, but not all, employees, individuals determined to be unusually susceptible to the adverse effect and thus not adequately protected by the level should be protected by other measures, including, if necessary, removal and relocation.
5. Where the recommended safe exposure level cannot be maintained by any of the above measures, other appropriate controls or modifications should be implemented or the operation should be terminated.

B. Job and Rate Retention:

For each employee removed from a particular workplace by reason of implementation of Section IV.A.4 above, a reasonable effort should be made to find alternate employment in Celanese with comparable rate of pay, seniority and other employment benefits. Removals or relocations which will result in significantly less pay or other benefits should be reviewed by the Law Department and company or corporate Medical Department.