Interoffice Memo

Hoechst Ce

cc:

PLAINTIFF'S EXHIBIT CEL-851

Date: September 14, 1988

To: Darrell Pausky

From: G.A. Vos

Dept/Location: Bishop Facility

Dept/Location: DEHSA/Bed. I
GAV-156-88

Subject: **Bishop Facility- Environmental, Health and Safety Audit (EH&S) - November 14-18, 1988**

This memorandum is to confirm that the Bishop facility has been scheduled for a comprehensive, EH&S audit during the week of November 14, 1988. I will be the team leader assisted by Maurice Leduc, Corporate Environmental Auditor, Bedminster I; Kevin Lombardozzi, Corporate Industrial Hygiene Auditor, Bedminster I; Dr. Pense, Process Safety/Industrial Hygiene Auditor, Frankfurt, West Germany, and a Safety & Loss Prevention Auditor to be announced. We will start the audit at approximately 9:00 a.m., November 14, 1988.

We do not plan to use advance questionnaires as part of the audit process. However, there is certain information that the audit team will need so that the audit can be conducted efficiently and effectively. Attachment A is a list of the information we need from the facility. Where we have asked you to provide the information, please send a copy to me at the Bedminster I office and directly to M. Leduc, K. Lombardozzi, and Dr. Pense at their respective locations by October 17, 1988.

Where we have asked for the information to be available, please have it available at the facility when the audit commences, November 14, 1988. If any of the information is not readily available, please call me in the Bedminster I office at (201) 231-4476. We do not expect you to develop new information during the preparatory phase of the audit. Also, this is a one time requirement. We will develop complete files on every facility during the first audit. For future audits, a quick update will be all that is required.

During the opening conference, we would appreciate a review by your staff of the following:

1. A status report of previous EH&S audit and hazard assessment findings;

2. A description of the facility operations including major changes;

3. The products, major raw materials and any recognized chemicals of concern;

4. The current plant management organization with emphasis on EH&S structure;

5. The major EH&S issues currently impacting the facility;

6. Emergency Response and Chemical Spill Control Programs

We will need assistance from your safety, health and environmental staff during the inspection and interview phases of the audit. Also, I plan to spend time with your staff to review the plant emergency response program and other community issues. I realize your resources are limited but we are willing to work in small groups during some portions of the audit if it is necessary. Hopefully, we will not be too obtrusive. In addition, we included a description of the audit program (Attachment B).

Your assistance in preparing the team for this audit is greatly appreciated. If you have any questions concerning the audit, please feel free to call me.

Grover A. Vos/map

Grover A. Vos

GAV/map

cc: J. Conway - Chatham
C. DeRose - Bishop
S. Engelman - Bedminster I
V. Parrillo - Chatham
G. Rowen - Bridgewater
J. Stelluto - Bedminster I

Audit Team: M. Leduc, Bedminster I
K. Lombardozzi, Bedminster I
Dr. Pense, Frankfurt, West Germany

ENFLEX Tracking System
Bishop Facility Audit File

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ATTACHMENT A

HOECHST CELANESE CORPORATION
Environmental, Health and Safety Audit Program

Advance Information Request

The following information will be used by the audit Team members to prepare for the facility visit. Where information is not readily available, please provide your best estimates.

I. Chemical Inventory and Usage

Provide for the audit team a list of all hazardous chemicals used, handled or made in quantities greater than 100 kg. per year. Include raw materials, intermediates, catalysts, by-products, products and utility chemicals. With respect to each chemical, please provide:

A. Common or trade name of the chemical

B. Specific chemical names, including known constituents of mixtures

C. Description of use (e.g., product, catalyst, etc.)

D. Annual volume used or made

E. Normal inventory amount and size of largest tank for each chemical

F. Method of storage (e.g., tanks, drums, pallets, etc.)

II. Flow Sheets

Provide a simplified process flow sheet or block diagram of each or process unit which shows chemical reaction, the point where raw materials and other chemicals are added to the process, and significant air emissions, wastewater and cooling water discharges and other wastes removed from the process.

III. Facility Information

Provide a facility site plot plan. Have available unit plot plans and any diagrams or maps which include fire water systems, chemical and general sewers, waste storage areas, settling ponds, and active and abandoned waste disposal facilities.

IV. Location Information

Provide a map showing the facility, roads, railroads, wells, lakes, within a 10 km radius of the plant. Indicate on the map the sources of process, cooling, fire and drinking water. For each body of water designate if it is used for drinking water.

V. COMMUNITY INFORMATION - Provide:

A. A description of the area within 10km of the plant (e.g., rural, urban, heavily industrialized, commercial, residential, etc).

B. An estimate of the number of persons living or working within 10km and 1 km of the plant boundaries.

C. The total numbers of employees working at facility, total per shift, and total number of contractors.

D. An indication of the direction of prevailing winds. Does the area experience frequent air stagnation (inversion) periods? How often?

E. A description of the general topography of the plant site, and the area within 10km of the plant boundaries.

VI. Regulatory Information

Provide copies of applicable local and state/provincial environmental, occupational health, safety, transportation, toxic substance control and other applicable regulations. Have available applicable Federal regulations.

VII. Policy and Procedures

Provide copies of applicable EH&S policies, procedures and guidelines including available facility accident prevention plans, spill control prevention plans, emergency response programs or documents describing your safety, industrial hygiene or environmental programs. Have available copies of applicable business unit/division EH&S policies, procedures, guidelines, accepted or model practices or other documents of this nature.

VIII. Audit and Compliance History

Have available all records on prior EH&S audits, insurance inspections, (both fire protection and boiler machinery inspections), property protection or fire and explosion inspections, any active court orders, variances, compliance orders, administrative orders or citation reports; and your actions in response to the above and a current status report for each item.

IX. Environmental, Health & Safety Program Information

Have available copies of the facility safety statistics reports for the last 3 years, property loss records, environmental permits, emissions or discharge inventories, applications for pollution control, discharge or construction permits and monitoring records, quality assurance and reliability testing programs for your facility.

ATTACHMENT B

DESCRIPTION OF THE EH&S AUDIT PROCESS

Purpose

To assure that every Hoechst Celanese facility, affiliate, and subsidiary is in compliance with applicable laws and regulations and with Corporate policies and Business Unit procedures and model practices as they relate to environmental, health and safety issues.

Types of Audit

1. Comprehensive - This type of audit will cover environmental, safety, loss prevention, product safety, industrial hygiene, employee health, and community issues. It will be conducted by a team of 4-5 professionals and take 2-5 days to complete, depending on the size and complexity of the facility. Standard protocols and criteria will be written for each functional area.

2. Target - This type of audit will focus on individual issues or problems. It will be conducted by 1-2 professionals and usually require 2 days to complete. Several issues have been identified for Target audits in 1986. These include Process Safety Reviews, Medical and Health Monitoring Information Systems, the Hazards Communication Standard, PCBs in electrical transformers and several TSCA issues i.e. Premanufacturing Notification.

Frequency of Audit

Every Hoechst Celanese facility will receive a comprehensive audit at an average interval of 2 years not to exceed 3 years. Target audits will be scheduled as needed to assess compliance with specific rules or regulations by facilities most likely to be affected. Target audits will be expanded to international facilities in 1987.

Scheduling and Prioritization

The selection of facilities to be audited each year will be based on several factors:

1. The interval since the last audit in each functional area.

2. The recommendations of the people who participated in the previous audits and facility hazard assessments.

3. The number of significant findings in the previous audits and the number of findings that are still open (the problem has not been corrected).

In addition, a computer program has been written to weigh other elements of risk associated with an individual facility. This will be used to augment the information above.

Audit Team

The audit team will consist of the following:

- Team Leader selected from the Corporate EH&S staff
- An environmental specialist
- A specialist in safety and loss prevention
- An industrial hygienist
- A discretionary member selected by the team leader to provide special expertise in areas such as process safety, medical, vapor cloud definition, TSCA requirements, etc.

The team members will be selected from business unit and facility staff. Teams will be scheduled where possible to avoid any team member from inspecting a domestic facility falling within his own business unit. The fifth team member may be a consultant with special skills in assessing process hazards. The position may be filled with a senior consultant to provide audit training during the conduct of the audit and provide an independent assessment of the effectiveness of the audit process and team.

Audit Reports

The audit team leader will file a written audit report with the facility manager and the responsible Business Unit general manager covering specific findings in each of the EH&S functional areas. The Director of Corporate EH&S Audit Programs will present regular audit staff reports to the Chairman's Committee.

Action And Follow-up

The facility manager will be required to write an Action Plan addressing every finding within 45-60 days after receiving the final audit report and quarterly thereafter until all corrective action has been addressed. The Corporate audit group will develop a computer program to systematically track all audit reports and Action Plans.

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ATTACHMENT C

AUDIT SCHEDULE

BISHOP FACILITY

MONDAY Nov. 14	- Arrive at Bishop	
	9:00	OPENING CONFERENCE & PLANT TOUR
	13:00	BEGIN DAILY AUDIT ACTIVITIES
	16:00	END DAILY AUDIT ACTIVITIES
	16:15	AUDIT TEAM DISCUSSION
	18:00	END DISCUSSION
TUESDAY- THURSDAY, Nov. 15-17	08:00	BEGIN AUDIT*
	12:00-13:00	NOON - LUNCH
	16:00	END DAILY AUDIT ACTIVITIES
	16:15-18:00	TEAM DISCUSSION
FRIDAY Nov. 18	08:00-09:00	FINAL AUDIT TEAM DISCUSSION
	11:00	DISCUSSION OF AUDIT RESULTS WITH MANAGEMENT AND CLOSING REMARKS

* Auditors will work in pairs, independently, or with facility representatives as necessary.

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