IV. Procedures for Reporting

1. Corporate Review Committee

A Review Committee is hereby established to review all reported information and make the determination as to whether a substantial risk to health or the environment is presented. The Review Committee is composed of:

Chairman:	Corporate Director, Environmental and Health Affairs (DEHA)
Secretary:	Corporate Director, Product Safety (DPS)
Regular Members:	Corporate Medical Director
	Law Department Assignee
Special Member(s):	Operating Company Contact from the affected company or companies

The DPS will maintain all files, minutes and logs of the Review Committee and serve as the official contact for all purposes. Alternates to be contacted when the DPS is unavailable are listed in Appendix C.

2. Transmission of Information

Information which is to be considered for a substantial risk determination received by an employee or officer of an operating company should be immediately submitted to that company's designated contact (Appendix C). Each operating company should have its own internal procedures for assuring that the designated operating company contact is notified of the information as quickly as possible.

The company contact will review this information to determine if any of the exemptions listed in Section III of this procedure apply. If so, the company contact should immediately report this determination to Corporate DPS or one of his alternates listed in Appendix C by telephone, and then should document the determination in a memo to the original submitter with a copy to the Corporate DPS, to be sent within five working days of date of first receipt of the information by a Celanese employee. This memo must advise the original submitter that by reporting to the operating company contact the submitter has discharged his reporting obligation under Section 8(e) of TSCA. Also, the memo must advise that if the submitter doesn't agree that the exemption applies, he can as an individual submit the information to EPA.

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Corporate V.P. - Administration
Corporate V.P. - Communications
Government Affairs Office - Washington
General Counsel
Affected Operating Company President(s)
Affected Operating Company Contact(s)
Members of Review Committee

All correspondence on Section 8(e) will be kept in a file maintained by the Review Committee Secretary.

The Committee will also determine what actions should be taken under "Guideline for Response to Chemical Hazard Alert/Environmental Health Hazard", (EHG-1-78).

4. Confidentiality Claims

The Review Committee will make all final determinations of confidentiality. The operating company contacts shall be responsible for collecting any information required to substantiate a claim of confidentiality.

5. Instances of Environmental Contamination

Emergency incidents of environmental contamination are to be treated as a special case.

An emergency report of environmental contamination is required when a discharge (defined in Appendix B) occurs of a chemical substance or mixture to which any of the adverse health effects listed in Appendix A have been ascribed and which, because of the pattern, extent, and amount of contamination -

a) seriously threatens humans with cancer, birth defects, mutation, death, or serious or prolonged incapacitation, or
b) seriously threatens non-human organisms with large-scale or ecologically significant population destruction.

In most situations reporting procedures will be carried out under Section 311 of the Federal Water Pollution Control Act in accordance with each operating company's spill prevention and control program. Where a Section 311 report has not been made, however, then EPA must be notified by telephone of the environmental contamination. The company contact should immediately notify the Corporate DPS or his alternate by telephone and, thereafter, file a written report to the Review Committee as described in Section IV of this procedure. If the DPS judges that the information is reportable under Section 8(e), he will call the appropriate regional EPA office.

APPENDICES

The Review Committee will assume the responsibility of evaluating the information submitted and making the determination of substantial risk. The information in the appendices should assist the employees and officers of operating companies in their initial assessment of information prior to submission to the Review Committee. If there is any doubt on what should be reported, submit the information to the Review Committee (Section IV) for resolution.

Appendix A

This appendix contains information on human health effects and toxicological testing results which will be used in making judgments on substantial risk questions. The information contained in this Appendix can be used by the operating company contact to help answer questions and make judgments on substantial risk prior to implementing the reporting procedures described in Section IV of this Administrative Procedure. For example, an observation of a known human health effect such as skin irritation among workers who are handling a chemical known to cause skin irritation should not be considered a substantial risk question. However, if the chemical or mixture was thought to be innocuous and a pattern develops showing new and unexpected human health effects, or effects much more serious than expected, then a substantial risk question is raised.

In all cases where a new, unexpected or more virulent than expected human health effect is observed, the company contact should consider this an appropriate question to submit to the Review Committee for a substantial risk determination. Also, any adverse toxicological testing results should be similarly reviewed. The conservative approach may be the most prudent when questions on a Section 8(e) determination are raised.

This Appendix also contains information on environmental hazards which could be reportable under Section 8(e).

1. Human Health Effects

Information on the following health effects would be considered substantial risk information and would be reportable to the EPA:

a) any known instances of cancer, birth defects, death or serious or prolonged incapacitation if one (or a few) chemical(s) is strongly implicated; or
b) any pattern of effects or evidence which reasonab

2. Toxicological Test Results

Information on the following effects in non-human species may indicate a substantial risk for humans and the environment. Toxic effects which have not been seen before in experimental species or which are much more severe than that which has been seen in previous studies should be reviewed. Mutagenic effects, which have on occasion correlated with carcinogenic effects, might not by themselves be considered substantial risk information, particularly if the effect has been demonstrated in only one test system such as the Ames/ microsomal assay, but such effects should be reported for review by the Review Committee.

Effects which should be considered for review according to the above criteria include:

a) acute toxic effects;
b) irritation;
c) sensitization;
d) behavioral effects;
e) neurological effects;
f) carcinogenic effects;
g) teratogenic effects;
h) reproductive effects; or
i) mutagenic effects.

Tests which would reveal this type of information include in-vivo tests such as:

a) acute toxicity (oral, dermal and inhalation);
b) primary skin irritation (eye and skin);
c) skin sensitization;
d) sub-acute toxicity (oral, dermal and inhalation);
e) long-term toxicity including bioassays for carcinogenic effects;
f) metabolism studies;
g) teratology studies;
h) reproduction study (one-three generation);
i) aquatic testing; or
j) in-vivo and in-vitro mutagenicity and carcinogenicity studies.

c) Storm water run-off;
d) Discharge to water treatment systems outside the property line (e.g. municipal waste treatment plant, regional system, etc.);
e) Spills that escape to surface waters outside property line --
   - onto plant property, or
   - from a land, water or air transportation vehicle;
f) waste injection well leak or discharge into ground waters other than the specific receiving conate waters as permitted by the State of Texas; and
g) Leakage or drainage from land fill, pits, ponds, lagoons or waste water treatment facilities into an aquifer or surface waters beyond plant property line.

3. Examples of <u>discharges into air</u> include:

a) Point source emissions from a plant site;
b) Fugitive emissions from a plant site;
c) Emissions from a spill on or off the plant site;
d) Vent emissions from transportation vehicles or pipelines;
e) Emergency emissions from equipment failure or non-routine operation ("equipment" includes plant facilities, pipelines and vehicles for land, water or land transportation; "failure" includes operator error, equipment malfunction, explosion, fire, rupture from collisons, etc.);
f) Evaporation from contained liquids (such as from pits, ponds, lagoons, evaporation ponds, open ditches and open or leaking tanks);
g) Emissions from cooling towers; and
h) Emissions from land fills.

4. An example of <u>discharge onto land</u> is:

Liquids or solids discharged or spilled onto land other than a permitted land fill (if the substance is classified as "hazardous" under RCRA the land fill must be permitted as a hazardous land fill).

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