

CELANESE SPECIALTY OPERATIONS
Technical Center
Corpus Christi, Texas

PLAINTIFF'S
EXHIBIT
CEL-581

To: All Employees December 4, 1985
From: D. A. Chadwick DAC-141-85

Hazard Communication Standard

There is a new OSHA standard that is intended to assure that information reaches you concerning hazards and protective measures for chemicals that you handle. The standard is the Hazard Communication Standard.

Since you may have already received memos or heard references to the Standard (and will receive more information in the future), the following information will help to give you an overall understanding of what is required by this legislation.

The Standard had a deadline of November 25, 1985 for the following requirements.

- Labels on incoming shipments of chemicals must not be deliberately defaced so that information on the label cannot be read.

Notification of this requirement was sent out on November 4th DAC-135-85.

- An MSDS must be requested from a manufacturer or distributor if one is not received with a shipment and a current MSDS (less than 3 months old) is not on-hand.

Notification of this requirement with letter forms was sent out on November 25th DAC-Memo-85. A file of MSDS has been set-up in the library and notification of this file was sent out on November 25th DAC-MEMO-85. To access the MSDS index on the VAX, program your login.com with

MSDS :==\$ EDR DISK2:[CELMIS]INDEX.MSDS

and use the editor keys to search the file.

- An MSDS must be obtained or developed for each chemical produced in Pilot Plant units including products and intermediates present at 1% or greater by weight or volume or 0.1% for carcinogens.

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Products and intermediates were identified and MSDS obtained by November 25th. The MSDS are in the library MSDS files.

- An MSDS must be included with each shipment of chemicals off-site, including shipments to other Celanese locations.

CSO Company Policy has been to include an MSDS with chemical shipments.

- Containers shipped off-site must be properly labeled with company name, address, identity of material, and hazard warnings.

A guide to lead you directly to the appropriate hazard warnings for labels has been built into worksheets for developing an MSDS.

The second deadline under the Standard is May 25, 1986 and requirements for this deadline affect primarily Pilot Plant operations and Maintenance.

- An MSDS be obtained for incoming chemicals (purchased, received from other Celanese locations, brought on-site by contractors, free samples received, and materials otherwise obtained) - applies facility wide.
- Procedures be developed for setting-up and maintaining a current list of hazardous chemicals.
- Methods be developed to inform on-site contractors of chemical hazards.
- On-site containers of chemicals be labeled with identity of material and hazard warnings (includes bags, barrels, bottles, boxes, cans, cylinders, drums, reaction vessels, storage tanks, but does not include pipes - our internal Celmis hazard ratings system may meet the requirement for hazard warnings).
- Methods be developed to inform employees of hazards of the chemicals in unlabeled pipes.
- The hazards of non-routine tasks such as cleaning of reactor vessels must be defined.
- Employees must be informed about the requirements of the Standard.
- Employees must be trained in the hazards of the chemicals they handle and methods to protect themselves from exposure.

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- A Hazard Communication Program be written which addresses compliance methods for each requirement.

The first part of the written program which addresses requirements for the November 25th deadline has been written, and is available to you through your Group Leader or Supervisor. Copies have also been distributed to Superintendents, Managers, and Directors.

D. A. Chadwick
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To: All Employees December 4, 1985
From: D. A. Chadwick DAC-142-85

Hazard Communication Standard Information

Information meetings on the Hazard Communication
Standard will held on

December 10, 1985

and

December 12, 1985

at

2:00 pm

in the

Seminar Room

The intention of the Standard is that information on the hazards of chemicals be transmitted to employees and other handlers through the use of Material Safety Data Sheets and labels. This Standard will have a great deal of impact on anyone handling chemicals both from the standpoint of the information they can expect to receive and also the information they are expected to make available to others.

It is a requirement of the Hazard Communication Standard that employees be informed of the Standard and all employees who work with chemicals should attend.


D. A. Chadwick

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