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DISTRIBUTION LIST

MRS-57-80 - Summary of Plant Ind. Hygiene
Responsibilities Related to
Implementation of Medical Sur-
veillance Project

TO:

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R. M. Guedin - CCCTC
R. F. Stubbeman - CCCTC
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002093

**PLAINTIFF'S
EXHIBIT**

CEL-179

tabbles

ateroffice Memorandum

TO (Name and Location)	DATE
As Listed	March 12, 1980
FROM (Name and Location)	REFERENCE NO.
M. R. Stenzel	MRS-57-80

Subject: Summary of the Plant Industrial Hygiene
Responsibilities Related to Implementation
of the Medical Surveillance Project

The Plant Industrial Hygienist (IH) will have major responsibilities relating to the implementation of the Medical Surveillance Project (MSP). The modules of the MSP affecting the IH include the Hazardous Chemical (HC) Module, Industrial Hygiene (IH) Module and Work History (WH) Module. The Work History Module requires the collection of present and future data (zone tracking) and the reconstruction of past work history information (retrospective). The IH's responsibilities with the Work History Module greatly overlap with those of the Industrial Relations functions at the plant. In general, the IH has only minor responsibilities relating to the Medical Module.

The IH Module is to be fully implemented at all locations including the CCCTC and the Terminals by July 1, 1980. The zone tracking portion of the WH Module is to be implemented by October 1, 1980. The retrospective portion of the WH Module is to be completed by December 31, 1980. The HC Module has been implemented but it needs to be fine-tuned before it can be used to interact with the other modules.

The following key tasks relating to the IH functions have to be completed for the MSP to be implemented.

- I. Industrial Hygiene Module - Computer programming has begun and will continue into June. The information required for each component of the module must be ready to be inputted as the computer programs are completed.
 1. By May 1, complete the Zone Description Forms. Attachment I is a draft of the form. The final version will be available about April 1.
 2. By May 1, complete the short and/or long version of the Exposure Zone Qualitative Data Form. Attachment II and III are drafts of the short and long forms, respectively. The final versions will be available about April 1. The final versions of the forms presented in Attachments I-III will only change in format, therefore, you can start gathering the data right away.

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I.

3. Complete transfer of all old IH monitoring data from the blue forms to the yellow forms by June 1.
4. Review all Industrial Hygiene Monitoring Forms (IHMF) for completeness (i.e., job classifications, zones, etc.) by May 1.
5. The IHMF's will probably be inputted into the system in May or early June. It should be noted that after each of the IHMF's are inputted, the IH will need to review the computer report of the form to ensure that it was entered correctly.
6. Input the PEL Dictionary by approximately May 1, 1980. The PEL Dictionary will be inputted at the Company level but each IH will need to review it for completeness and accuracy.
7. Input all old Interpretive Statements and Unusual Occurrence Reports by approximately June 1, 1980.
8. Input all previous letters notifying employees of toxicity test results via the Interpretive Statement input form by approximately June 15, 1980.
9. In cooperation with the IR Department, update the Job Classification of all employees to ensure that the classifications are consistent with the requirements of the MSP. This task should be completed by approximately June 1, 1980. It should be noted that the list of all job classifications present at each Plant should already have been completed. The delay by several Plants in submitting the job classification list is starting to interfere with the implementation schedule.
10. Assist the Company IH Group with the following tasks:
 - a. Development of the statistical programs necessary to evaluate the IH monitoring data.
 - b. Insure all system dictionaries are complete.
 - c. Finalize the report requirements of the IH Module relating to both quantitative and qualitative data.

II. Exposure Module - Zone Tracking - Most of the items in this section require a joint effort between the Plant IH and Plant IR Departments.

1. Construct a list of all job classifications present at each plant for salaried, SNE and hourly employees.

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II.

1. (cont.)

This task was to have been completed in January.

2. The Company IH group was to take the list of classifications in (1) and construct a master list by January 15, 1980. When (1) is completed and the final list is prepared, the Plant IH's will need to review the list.
3. The Company IH group constructed a list of job classification letter codes to be used to handle situations where an employee works a job classification other than his/her own. It is the Plant IH's responsibility to ensure the list is extensive enough for his location.
4. As requested, aid Roland Laird in the production of the Zone Tracking Medical Surveillance Training Film.
5. The update of job classification codes must be updated (see Section I-9).
6. Aid the IR Department in training employees to complete zone tracking (exposure) cards.
7. Aid the IR Department in the final implementation of the Exposure Module.

III. Exposure Module - Retrospective Work History - The Plant Committee is to be named by March 14, 1980. The procedure to be used to collect retrospective work history will be presented to the Plants during the visits by representatives of the Company IH group and Carol Whaley of Bay City in March or early April. The following lists of tasks outline the procedure to be followed in obtaining retrospective work history at each Plant.

1. The committee will reconstruct the history of present and previous processes used at the Plant.
2. The job responsibilities as they relate to the procedures mentioned in (1) will be determined.
3. Process description code numbers will be established.
4. The chemicals associated with each of the above processes, exposure potential, modes of exposure and estimate of normal exposures will be determined.

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III.

5. Each of the present employees will be requested to complete a questionnaire relating to their work history.
6. The IR Clerk will review the personnel records of all present and past employees and complete several forms which document general information on the employee along with work assignment information.
7. The computer will match the data generated by the Clerk and the Committee.
8. The Committee will review the complete summary of the data for completeness and accuracy.

IV. Hazardous Chemical Module

The Hazardous Chemical Module is the hub of the MSP. It provides an avenue to link data from each of the modules. It is very important that the HC Module be properly updated. In fact, you will not be able to enter much of the data from the other module unless it is updated. This constraint dictates that the CCCTC and the Terminals must have the HC Module implemented before any other module is implemented.

The HC Module will require updating relating to the following items:

1. Qualitative Form - A chemical can not be listed on a qualitative form for a particular zone unless it is first listed as being used at the location.
2. Quantitative Data - An Industrial Hygiene Monitoring Form can not be entered into the system unless the contaminant is listed in the exposure zone being monitored.
3. Tank car (TC) or tank truck (TT) cleaning - If possible, TC or TT cleaning areas should be listed as a separate zone. The residue chemical usually present in incoming transportation vessels should be listed in that zone even though Celanese does not produce, consume or use the material as a process chemical.
4. Retrospective Work History Chemicals - All chemicals listed on the Process Description Form of the Retrospective Work History Module must be listed along with use dates. It should be noted that many of these chemicals may no longer be present at the facility.

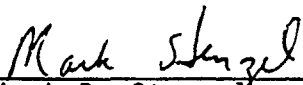
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IV.

5. Review of Purchased Chemicals - All chemicals purchased at the location should be listed in the HC Module.
6. PEL Dictionary - All chemicals which have a PEL will have to be entered into the system. The Company IH group will enter these chemicals but the list must be reviewed by the Plant IH's.

Each Plant will need to submit their list of chemicals approximately one month before the particular component of the MSP is to be implemented. This will allow the Company IH group ample time to input the chemicals into the system. The chemicals for the Retrospective Work History Module need to be submitted approximately 1 month before the Plant expects the computer to match data.

The above letter is meant to list all items relating to the MSP which will require some time. But considering the complexity of the system, there may be several minor items inadvertently omitted.



Mark R. Stenzer
Company Industrial Hygienist

MRS:gl
Attachments

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INDUSTRIAL HYGIENE EXPOSURE ZONE DESCRIPTION FORM

LOCATION:		Company	Plant	DATE:	
Zone No.	Card No.	Figure No.	Comments	Option to Delete	
13	1	17	21-79	50	
	2	17-79			
	3	17-79			
	4	17-79			
Zone No.	Card No.	Figure No.	Comments	Option to Delete	
13	1	17	21-79	50	
	2	17-79			
	3	17-79			
	4	17-79			
Zone No.	Card No.	Figure No.	Comments	Option to Delete	
13	1	17	21-79	50	
	2	17-79			
	3	17-79			
	4	17-79			
Zone No.	Card No.	Figure No.	Comments	Option to Delete	
13	1	17	21-79	50	
	2	17-79			
	3	17-79			
	4	17-79			
Zone No.	Card No.	Figure No.	Comments	Option to Delete	
13	1	17	21-79	50	
	2	17-79			
	3	17-79			
	4	17-79			

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EXPOSURE ZONE QUALITATIVE DATA FORM
(SHORT FORM)

Company

Plant

LOCATION: _____ EXPOSURE ZONE: _____
1 4 7DATE: _____ JOB CLASSIFICATION: _____
10 16Card No. Job Classification Option To Delete (D) _____
801
20 21-792
20 21-793
20 21-794
20 21-795
20 21-796
20 Does the job require a respirator? (Y=YES, N=NO) _____ If Yes,
Duration: _____ min/day 21
22

Contaminant No. Contaminant Name

7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____7
20 21 _____

002100

EXPOSURE ZONE QUALITATIVE DATA FORM
(LONG FORM)

LOCATION: _____		Company _____	Plant _____	EXPOSURE ZONE: _____
DATE: _____		JOB CLASSIFICATION: _____		
Card No.	Job Classification	Option to Delete (D) _____		
1	21-75			
2	21-79			
3	21-75			
4	21-75			
5	21-75			
6	Does the job require a respirator? (Y=Yes, N=NO) _____ If Yes, Duration: _____ min/day			
7	21-75	1		
20	21-75	20		
Contaminant No.		Contaminant Name		Mode of Exposure
Is a respirator required? (Y=Yes, N=NO) _____		Skin _____ 42		
If yes: _____		Inhalation _____ 43		
(see key) Face Piece: _____ Type: _____		Other _____ 44		
Duration _____ Minute/Day		Exposure (see key)		
Estimate of Normal Exposure _____		Type _____ 45		
OR Concentration _____ Units		Frequency _____ 46		
34 _____ 35 _____ 40 _____		Duration _____ 47		
Comments _____				
7	21-75	2		
20	21-75	20		
Contaminant No.		Contaminant Name		Mode of Exposure
Is a respirator required? (Y=Yes, N=NO) _____		Skin _____ 42		
If yes: _____		Inhalation _____ 43		
(see key) Face Piece: _____ Type: _____		Other _____ 44		
Duration _____ Minute/Day		Exposure (see key)		
Estimate of Normal Exposure _____		Type _____ 45		
OR Concentration _____ Units		Frequency _____ 46		
34 _____ 35 _____ 40 _____		Duration _____ 47		
Comments _____				
7	21-75	2		
20	21-75	20		
Contaminant No.		Contaminant Name		Mode of Exposure
Is a respirator required? (Y=Yes, N=NO) _____		Skin _____ 42		
If yes: _____		Inhalation _____ 43		
(see key) Face Piece: _____ Type: _____		Other _____ 44		
Duration _____ Minute/Day		Exposure (see key)		
Estimate of Normal Exposure _____		Type _____ 45		
OR Concentration _____ Units		Frequency _____ 46		
34 _____ 35 _____ 40 _____		Duration _____ 47		
Comments _____				
7	21-75	2		
20	21-75	20		
Contaminant No.		Contaminant Name		Mode of Exposure
Is a respirator required? (Y=Yes, N=NO) _____		Skin _____ 42		
If yes: _____		Inhalation _____ 43		
(see key) Face Piece: _____ Type: _____		Other _____ 44		
Duration _____ Minute/Day		Exposure (see key)		
Estimate of Normal Exposure _____		Type _____ 45		
OR Concentration _____ Units		Frequency _____ 46		
34 _____ 35 _____ 40 _____		Duration _____ 47		
Comments _____				
7	21-75	2		
20	21-75	20		
Contaminant No.		Contaminant Name		Mode of Exposure
Is a respirator required? (Y=Yes, N=NO) _____		Skin _____ 42		
If yes: _____		Inhalation _____ 43		
(see key) Face Piece: _____ Type: _____		Other _____ 44		
Duration _____ Minute/Day		Exposure (see key)		
Estimate of Normal Exposure _____		Type _____ 45		
OR Concentration _____ Units		Frequency _____ 46		
34 _____ 35 _____ 40 _____		Duration _____ 47		
Comments _____				

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AIR MONITORING PROCEDURE

1. Monitoring is initiated if it is required by regulation, if the Plant Industrial Hygienist feels it is necessary, if supervisory personnel request it or if employees express concern with a particular exposure situation. The Unit Supervisor is usually notified before sampling occurs in his Units.
2. The samples are collected. The employees are encouraged to ask questions regarding the material being sampled and the procedure used to sample.
3. The samples are analyzed.
4. The exposure level of the employee is calculated and the material is recorded on the blue Industrial Hygiene Monitoring Forms (IHMF).
5. The Plant Industrial Hygienist writes an interpretive statement and completes a Data Distribution Form (DDF).
6. The data is distributed in the following manner:
 - Interpretive Statement and DDF
 - Plant Manager
 - Technical Manager
 - Industrial Relations Manager
 - Interpretive Statement, DDF, Original IHMF
 - Safety Supervisor
 - Interpretive Statement, DDF, Copies of IHMF
 - Company Industrial Hygiene Group
 - Production or Maintenance Manager (depends where employee works)
 - Laboratory Superintendent

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The Production or Maintenance Manager circulates his copy to the appropriate superintendents. The Laboratory Superintendent circulates his copy to the Instrument Section Group Leader. --

7. The Safety Department is to notify the employee of the monitoring results within five (5) working days. The date on the Interpretive Statement is the date of record.
8. Notification consists of a representative of Safety personally presenting the employee a copy of the Interpretive Statement and the DDF. The requirement is satisfied if the Safety representative posts the results on the appropriate bulletin board. Note: If the Safety representative does not post the results himself, he must check the unit to see if the results were posted in the required time frame.
9. Questions regarding the monitoring can be addressed to the employee's supervisor, the Safety Supervisor or the Plant Industrial Hygienist.

002103

DISTRIBUTION LIST

GAV-43-81 - Corporate I.H. Program Reviews

TO

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CCCTC

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J. W. Dunn
G. R. Osborne
R. E. Tower

Dallas

R. E. Larsen (3)
J. K. Stafford (3)

Pampa

B. P. Hanson
K. L. Lombardozzi
J. D. Wilson

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B. Adams (1)
G. D. Bailey
C. D. Barrett
L. J. Enders (1)
S. P. Krivan (1)
M. R. Stenzel
L. R. Birkner (NY)
S. A. Davis (NY)

002104

~~CONFIDENTIAL~~

(Name and Location)	DATE
As Listed	February 27, 1981
FROM (Name and Location)	REFERENCE NO.
G. A. Vos	GAV-43-81

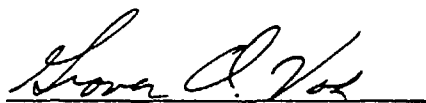
Subject: Corporate I.H. Program Reviews

The Corporate Department of Environmental Health and Safety Affairs is in the process of reevaluating their I.H. program review procedure. In the meantime, they have cancelled the reviews through June of 1981. To aid us in responding to any Corporate request for information, I would like each Plant to provide an I.H. review program concept and procedures outline. In developing this information, please consider the purpose of this type program from the Corporate, Company and Plant perspective and balance the needs of each as you perceive them. Spell out in some detail what the review should concentrate on and how they should be conducted and what type of action should follow. The Plant responses will be reviewed and consolidated and discussed at the next meeting of the operating Company's I.H. Managers. To be included, we must receive your response by March 24, 1981. If you do not have any comments on review programs, please drop us a note by March 24, 1981 also.

In the meantime, the Chemical Company will proceed with its internal review procedure which will be completed by mid-March 1981 with the review of the Bayport Terminal program.

Tentative plans within the Chemical Company are for the reviews to continue with a greater degree of detail being emphasized on the next round. Since the next round is not planned until 1982, starting with the Plants we have ample time to develop our own procedure and aid in the development of the Corporate program.

To be meaningful, the review procedure needs input from the facilities. Without it, the process could become oppressive. If you have any questions, please give me a call.


Grover A. Vos

GAV:gl

002105

CELANESE CHEMICAL COMPANY
DALLAS, TEXAS

MRS-24-79

Third Revision of the Industrial Hygiene Monitoring Form

TO: <u>BAY CITY</u> DG BREMER CW WHALEY	CC: <u>BAY CITY</u> LE HACKFELD DH MILLER CJ SCHAEFER	
TO: <u>BISHOP</u> AR HANCOCK G ILLE MP NEFF	CC: <u>BISHOP</u> CW HARRISON RW JAMES PM SYKES	
TO: <u>CCCTC</u> RM GÜEDIN HP HAWTHORNE ES RAMEY	CC: <u>CCCTC</u> RA GANGEMI	
TO: <u>CLEAR LAKE</u> KF BAILEY RE GREEN JR LAIRD	CC: <u>CHARLOTTE</u> AG HOLTON T RICHARDSON	
TO: <u>DALLAS</u> CD BARRETT	CC: <u>CLEAR LAKE</u> JL WARD JJ BRUNER JW DUNN	
TO: <u>NYO</u> LR BIRKNER CS LAUBLY	CC: <u>DALLAS</u> RE GREEN BA MELAAAS BL PRITCHARD RW SWANBECK	RE LARSEN
TO: <u>PAMPA</u> HA THOMAS JD WILSON KL LOMBARDOZZI CL NICHOLS	CC: <u>NYO</u> MJ SAMEK L STARR	
TO: <u>BAYPORT</u> JE SANBORN	CC: <u>PAMPA</u> AA MILLER WH TUKE CE LOEFFLER	
TO: <u>CHARLOTTE</u> RV TAYLOR	CC: <u>TERMINALS</u> JT SIXEAS	NEWARK