

TEG: JCL: MME: RF

XF: LCCP

TO: Sid Pitts

FROM: T. G. Grumbles; J. R. Drumwright, M.D.

DATE: August 13, 1985

Interoffice
Communication

SUBJ: LCCC FACIAL HAIR POLICY

VISTA

Enclosed is a copy of the policy proposal with several specific editorial comments.

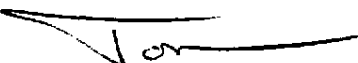
In regards to your two paragraphs regarding contractors, visitors, etc., we think you should add the other conditions that are known to prevent a proper seal such as temple pieces on glasses as well as facial hair. From a risk control and potential litigation standpoint, it is important to be consistent in policy application with all personnel in the plant.

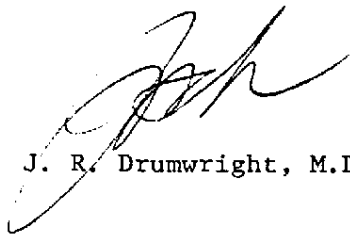
However, if this is a facial hair policy instead of a general respirator use policy, then reference to dentures, temple pieces, etc. appear to be out of place.

The context of this policy is not clear to us. Will it be part of an explanatory letter or posting to employees as part of a policy and procedures change, or a "stand-alone" announcement? We recommend some form of explanation for the change as other plants have done.

Based on the intent of this policy, we think it should be made clear that the contact lens "ban" is an already existing policy. Also, how do you plan to handle the spectacle kit needs for respirator users?

Please let us know if you wish to discuss the above.


Thomas G. Grumbles


J. R. Drumwright, M.D.

ajo/0808/7

Enclosure

cc RAC, JAD, RWS, SRA, KLF, RTF

VVV 000016706

RESPIRATORY PROTECTION
FACIAL HAIR POLICY

Respiratory protection equipment will not be worn when any condition prevents a good face to mask seal. Such conditions may include anything that contacts the sealing surface or that could interfere with the mask's exhalation valve function. Specifically, these conditions will be caused by facial hair (beards), long sideburns, absence of dentures, or temple pieces on glasses. Any condition which prevents getting an effective seal must be corrected before a respirator can be worn.

As a matter of policy, ALL Vista plant employees may be required to use self-contained or other respirators, either in the course of their normal job duties or in emergency situations. Therefore, no Lake Charles Chemical Plant employee will be permitted to have facial hair (beards) or other hair that could come in contact with the sealing surfaces of a respirator.

* Contractors and service companies who ^{complex} regularly have their employees working in the Lake Charles Chemical Plant must see to it that all those employees do not have facial hair or other hair that could come in contact with the sealing surfaces of a respirator.

Visitors, service representatives, vendors, delivery personnel and others who enter the plant on a transient and non-frequent basis will not be permitted to have facial hair or other hair that could come in contact with the sealing surfaces of a respirator if the work they do will require the use of a respirator.

* No glasses with temple pieces that pass through the sealing surfaces will be worn with full face respirators. Contact lenses will not be worn in the plant under any circumstances.

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