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PLAINTIFF'S EXHIBIT CEL 5060

Celunese CORPORATION OF AMERICA ADMINISTRATIVE PROCEDURES			
Section	1	GENERAL ADMINISTRATION	
A. P. No.	1-18	HANDLING MATTERS RELATING TO COMMERCIAL HAZARDS	A.P. No 1-18
Effective	February, 1963		

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1 COMMERCIAL HAZARDS COMMITTEE

under this the committee has no
It is the function of the Commercial Hazards Committee to decide what action the Corporation should take to safeguard itself, its employees and others against hazards brought to the attention of the Committee and relating to the manufacture and sale of the Corporation's products.

The Committee is composed of the Medical Director as Chairman, one or two representatives to be appointed by the President of each of the divisional companies, a representative of the Safety Department, and a representative of the Legal Department as Secretary.

The Committee meets on call of the Chairman. Company representatives are not required to attend meetings or discuss matters not affecting their company, and are not permitted to vote on such matters. Where unanimity cannot be achieved among participating members as to the action to be taken, the matter will be submitted to the Secretary of the Corporation for final decision.

2 ADMINISTRATIVE RESPONSIBILITIES

2.1 Medical Director

To make determinations as to the nature and extent of toxic and dermatitic hazards to health or life. To maintain a central file of all related correspondence and tests on matters coming before the Committee, in such detail as the Legal Department may deem sufficient for use in the event of legal attack.

2.2 Division Representative(s)

To familiarize themselves with the problems involved in requests they present to the Committee on behalf of their respective division and to this end consult with their division personnel.

2.3 Manager of Testing Department

To make determinations, subject to the approval of the President of his Company, as to the hazards other than toxicity or dermatitis - such as flammability, explosion or corrosion - arising from the use or handling of the product by persons other than the Corporation's employees.

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3 DETERMINATION OF COMMERCIAL HAZARDS WITH RESPECT TO NEW OR MATERIALLY ALTERED PRODUCTS (CONTD.)

desirable, and (d) whether, in his opinion, warning labels are desirable, together with proposed language for such labels. Where other commercial hazards, such as flammability, explosion or corrosion may be involved, the Chairman will, after obtaining the advice of the Company representatives on the Commercial Hazards Committee, refer the problem to the Corporate Safety Director for determination and report to the Commercial Hazards Committee.

The report of the Chairman will be considered at the next meeting of the Commercial Hazards Committee, and the members thereof representing the affected Companies and Departments of the Corporation will, when necessary, consult with the appropriate personnel as to the problems and report back to the Committee the recommendations of their Companies and Departments. Decisions will thereupon be made as to what, if any, action the Corporation will take to guard against the hazards involved. Decisions will include such matters as whether toxicological tests are to be made, whether the recommended label is to be approved as submitted or with certain changes, and what protective language, if any is to be included in technical bulletins and sales literature. They will also include statements of the precautions, if any, which will be required of employees in handling the products within the Corporation. If it is determined to have tests performed, the laboratory selected to perform them shall first be approved by the Medical Director.

Two copies of final proof of all labels will be submitted to the Chairman of the Committee before the label is printed. If the proof conforms to the labeling as approved by the Committee, one copy will be initialed by the Chairman and returned as authorization for printing. If proof does not conform to the labeling as so approved, the Chairman will so notify the person submitting it, who will either make the necessary changes or request submission to the full Committee for reconsideration.

Any request for the reprinting of an established precautionary label need not be submitted to the Chairman for consideration by the Committee provided the request for reprinting is of a label which the Committee has approved and there has been no change in the product or the circumstances surrounding the original approval by the Committee. It shall be the responsibility of the person ordering reprints to satisfy himself that the form of label which is ordered is the latest one which has been approved by the Committee. In cases of doubt it shall be his responsibility to contact the Chairman of the Committee.

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7 PROVISIONS AS TO INTERIM COMMUNICATIONS RELATING TO HAZARDOUS PRODUCTS

The Corporation finds it necessary from time to time to conduct tests and investigations concerning the possibility of hazards involved in the use, handling or sale of chemicals or other products. This may occur when new or changed products are under consideration, when complaints are received from customers or others regarding hazards or injuries, or if injuries occur within the Corporation.

As research and testing work is performed in the above situations, interim reports are written, often based on incomplete information and containing conclusions which will be modified as the studies progress. These reports occasionally result in a substantial amount of controversy expressed in correspondence which is rather generally circulated. This presents a serious legal hazard. In the event that claims or suits against the Corporation should later be brought involving the product in question, plaintiffs could serve subpoenas on the Corporation requiring the production of all documents bearing on such a situation, and statements regarding the hazardous nature of the product, even though incorrect, could be used against the Corporation.

For these reasons, it is most desirable to keep interim reports and correspondence on such subjects to a minimum and to avoid all general correspondence relating to such matters. This is not intended to prevent or curtail the circulation of final conclusions or determinations by the individuals made responsible therefor under Item 2. As an aid to achieving this result, the following precautions will be observed:

Written communications concerning hazards to person or property will be confined to the minimum absolutely necessary, and will be in the form of confidential memoranda. Preferably, communications will be conducted orally whenever feasible.

Such communications as must be written will be confined to factual data and statements of their inevitable significance, and will omit all opinions or speculation. The latter will be communicated orally.

Such communications concerning hazards to person or property as are necessary will be issued by the department performing the work on which the report is based, and will be directed through channels to the Corporation's Medical Director and the Legal Department, and no other copy (except that of the issuing department) will be made. It will be the responsibility of the Department Manager orally to advise and consult with interested members of other departments.

Inquiries by Company Presidents and other interested parties as to the hazardous qualities of our products and recommended action thereon will be directed only to the appropriate person, department or committee designated in Item 2.

SEAY_HAMMETT002223

L I HORN
ARLOTTE-2JELANESE CORPORATION OF AMERICA
522 Fifth Avenue
New York 36, New York

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ORGANIZATION CIRCULAR

October 12, 1956
Revised September 28, 1962*SUBJECT: COMMERCIAL HAZARDS COMMITTEE AND AUTHORITIES
FOR DETERMINATION OF COMMERCIAL HAZARDS

EFFECTIVE DATE: October 15, 1962

OBJECTIVES:

To establish and apply on a Corporation-wide basis, policies relating to the evaluation, mitigation and avoidance of commercial hazards in the manufacture and sale of the Corporation's products, including the obtaining and appraisal of toxicological data and the approval of warning labels.

PERSONS AND DEPARTMENTS RESPONSIBLE FOR DETERMINATION OF COMMERCIAL HAZARDS:Medical Director

It will be the responsibility of the Medical Director to make determinations as to the nature and extent of toxic and dermatitic hazards to health or life.

Manager of Testing Department

It will be the responsibility of the Manager of the Department performing the tests on the product, subject to the approval of the President of his Company, to make determinations as to hazards other than toxicity or dermatitis, such as flammability, explosion or corrosion, arising from the use or handling of the product by persons other than the Corporation's employees.

Safety Director

It will be the responsibility of the Safety Director to make determinations as to the hazards to employees arising out of their employment, subject to any applicable conclusions of the Medical Director, and, for hazards other than toxicity or dermatitis, of the appropriate Company President, or Department Manager.

Legal Department

It will be the responsibility of the Legal Department to make final conclusions as to actual or potential legal liability of the Corporation and the requirements of the law relating to the advertising, sale and use of hazardous products.

*Revised only to reflect
organizational changes

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ORGANIZATION CIRCULAR

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October 12, 1956
Revised September 28, 1962FUNCTIONS OF COMMERCIAL
HAZARDS COMMITTEE:

It will be the function of the Commercial Hazards Committee, based on the determination of commercial hazards by the responsible persons and departments or outside testing agencies, to decide what action the Corporation should take to guard against the hazards involved, as by making tests and using specific warning labels and protective language in bulletins and sales literature.

COMPOSITION OF
COMMERCIAL HAZARDS
COMMITTEE:

The Committee will consist of the Medical Director as Chairman, one or two representatives to be appointed by the President of each of the divisional companies, a representative of the Safety Department and a representative of the Legal Department, to be appointed by the Safety Director and General Attorney respectively.

METHOD OF OPERATION:

The Committee shall meet on call of the Chairman.

All members of the Committee will have equal voice in its deliberations, except that members representing Companies not affected by any matter under consideration will not vote on the issues relating to such matter. Company representatives will not be required to attend meetings as to which the agenda contains no matters affecting their Company. A quorum will consist of a majority of the members required to attend the particular meeting. No matter will be determined at any meeting not attended by a representative of all Companies affected by such matter; and no matter will be determined except by unanimous agreement of those present and entitled to vote on such matter.

Where unanimity cannot be achieved, the matter will be submitted to the Secretary of the Corporation for final decision, if requested by any member of the Committee entitled to vote on the matter.

The representative of the Legal Department will act as Secretary of the Committee. His duties will be:

- 1) To receive all suggestions and supporting data submitted to him for the agenda.
- 2) To prepare and issue copies of the agenda to all members, indicating for each item the objective to be reached at the meeting.
- 3) To prepare and issue copies of the minutes of each meeting.

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Revised September 28, 1962

Copies of the agenda with supporting documents attached will be distributed one week in advance of each meeting, and copies of the Minutes of each meeting will be distributed not later than one week after the meeting to all members of the Committee.

Minutes will be written in condensed form so as to:

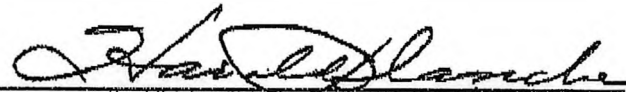
- 1) Highlight the problem areas of each item.
- 2) Record significant solutions discussed and decisions made by the Committee.
- 3) Record action to be taken by individual members of the Committee.

Matters will be brought to the attention of the Committee in accordance with the provisions of the Procedural Circular entitled "Procedure for Handling Matters Relating to Commercial Hazards."

A central file on all matters coming before the Committee will be permanently maintained in the office of the Chairman at the Corporation's Headquarters. Copies of all related correspondence and memoranda, including intermediate and final texts, will be maintained in this file in such detail as the Legal Department may deem sufficient for use as evidence in the event of legal attack.

COPIES OF CIRCULAR:

Executives, Department Heads, Plant Managers, District Managers and General Managers of Foreign Subsidiaries.


President

SEAY_HAMMETT002226

L. I. HORN
LOTTE-2

CELANESE CORPORATION OF AMERICA
522 Fifth Avenue
New York 36, New York

PROCEDURAL CIRCULAR

October 12, 1956
Revised September 28, 1962*

SUBJECT: PROCEDURE FOR HANDLING MATTERS RELATING
TO COMMERCIAL HAZARDS

EFFECTIVE DATE: October 15, 1962

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NOV 1 1962

1. Determination of Commercial Hazards With Respect to New or Materially
Altered Products

At any time when the Corporation commences the use, development or production of any chemical or other product which could present a commercial hazard to health or safety, or if previously used chemicals or other products are altered in any way which might present a new hazard of such nature, the Company Departmental Manager having supervision of the project, or his designee, will immediately submit to the Company representative on the Commercial Hazards Committee, who will forward to the Chairman, on a form to be supplied by such Committee, a request for determination as to tests, labels and protective language to be employed. The form will be designed to elicit all pertinent hazard information. A request for a new or revised label will be accompanied by proposed copy and layout.

Upon receipt of such request, the Chairman will assemble such data relating to possible commercial hazards of the product as may be available, and will submit the same to the Secretary of the Commercial Hazards Committee, with comments as to (a) whether and what commercial hazards may exist, including toxicity and dermatitis, (b) whether and what toxicological or dermatitic tests should be performed, (c) whether warnings in technical or sales bulletins are desirable, and (d) whether, in his opinion, warning labels are desirable, together with proposed language for such labels. Where other commercial hazards, such as flammability, explosion or corrosion may be involved, the Chairman will, after obtaining the advice of the Company representatives on the Commercial Hazards Committee, refer the problem to the Corporate Safety Director for determination and report to the Commercial Hazards Committee.

The report of the Chairman will be considered at the next meeting of the Commercial Hazards Committee, and the members thereof representing the affected Companies and Departments of the Corporation will, when necessary, consult with the appropriate personnel as to the problems and report back to the Committee the recommendations of their Companies and Departments. Decisions will thereupon be made as to what, if any, action the Corporation will take to guard against the hazards involved. Decisions will include such matters as whether toxicological tests are to be made, whether the recommended label is to be approved as submitted or with certain changes, and what protective language, if any, is to be included in technical bulletins and sales literature. They will also include statements of the

*Revised only to reflect
organizational changes

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precautions, if any, which will be required of employees in handling the products within the Corporation. If it is determined to have tests performed, the laboratory selected to perform them shall first be approved by the Medical Director.

Two copies of final proof of all labels will be submitted to the Chairman of the Committee before the label is printed. If the proof conforms to the labeling as approved by the Committee, one copy will be initialed by the Chairman and returned as authorization for printing. If proof does not conform to the labeling as so approved, the Chairman will so notify the person submitting it, who will either make the necessary changes or request submission to the full Committee for reconsideration.

Any request for the reprinting of an established precautionary label need not be submitted to the Chairman for consideration by the Committee provided the request for reprinting is of a label which the Committee has approved and there has been no change in the product or the circumstances surrounding the original approval by the Committee. It shall be the responsibility of the person ordering reprints to satisfy himself that the form of label which is ordered is the latest one which has been approved by the Committee. In cases of doubt it shall be his responsibility to contact the Chairman of the Committee.

No statements in advertising, letters, or any literature issued with regard to a Corporation product shall be inconsistent with precautionary statements which have been prescribed by the Commercial Hazards Committee for the product.

II. Decision of Commercial Hazards Committee as to Labeling Prerequisite to Shipment of Certain Corporation Products.

No chemical or other product of the Corporation which could present a commercial hazard to health or safety, including samples and intermediates, will be shipped outside the plant or laboratory, nor will such product be offered for sale, advertised, or described in Corporation literature without first obtaining precautionary labeling directions from the Commercial Hazards Committee. In cases of special necessity, when time does not permit a full evaluation of the hazards, the Chairman may temporarily authorize shipment or sale under general warning labels prescribed for such purpose by the Committee.

III. Inquiries Within the Corporation Concerning Protection of Employees.

The Corporation's Medical Director will advise and answer inquiries regarding toxic and dermatitic hazards and sound industrial hygiene practices for employees within the Corporation. The Medical Director will maintain close liaison with the Safety Department.

Literature for use within or without the Corporation relating to toxicity, dermatitis, and similar hazards, will be submitted by the Medical Director of the Corporation to the Legal Department for review, together with all necessary data, in order that statements circulated may be appropriate to furnish reasonable protection to the Corporation from legal liability.

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IV. Outside Inquiries Concerning Toxicity and Other Commercial Hazards.

Outside inquiries concerning toxicity and other commercial hazards will be referred initially to the appropriate Sales Manager. Where toxicity or dermatitis is involved, the Sales Manager will promptly refer such inquiries, through one of the Company representatives on the Commercial Hazards Committee, to the Medical Director for advice. It will be the responsibility of the Medical Director to consult with the Legal Department if the inquiry is of a non-routine nature. Where it appears to the Sales Manager that any outside inquiries involve possible claims against the Corporation, he will also refer them immediately and directly to the Legal Department for advice on handling. The Medical Director and the Legal Department will keep the Commercial Hazards Committee informed as to all such inquiries.

V. Provisions as to Interim Communications Relating to Hazardous Products.

The Corporation finds it necessary from time to time to conduct tests and investigations concerning the possibility of hazards involved in the use, handling or sale of chemicals or other products. This may occur when new or changed products are under consideration, when complaints are received from customers or others regarding hazards or injuries, or if injuries occur within the Corporation.

As research and testing work is performed in the above situations, interim reports are written, often based on incomplete information and containing conclusions which will be modified as the studies progress. These reports occasionally result in a substantial amount of controversy expressed in correspondence which is rather generally circulated. This presents a serious legal hazard. In the event that claims or suits against the Corporation should later be brought involving the product in question, plaintiffs could serve subpoenas on the Corporation requiring the production of all documents bearing on such a situation, and statements regarding the hazardous nature of the product, even though incorrect, could be used against the Corporation.

For these reasons, it is most desirable to keep interim reports and correspondence on such subjects to a minimum and to avoid all general correspondence relating to such matters. This is not intended to prevent or curtail the circulation of final conclusions or determinations by the individuals made responsible therefor under the Organization Circular entitled "Commercial Hazards Committee and Authorities for Determination of Commercial Hazards." As an aid to achieving this result, the following precautions will be observed:

1. Written communications concerning hazards to person or property will be confined to the minimum absolutely necessary, and will be in the form of confidential memoranda. Preferably, communications will be conducted orally whenever feasible.

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2. Such communications as must be written will be confined to factual data and statements of their inevitable significance, and will omit all opinions or speculation. The latter will be communicated orally.
3. Such communications concerning hazards to person or property as are necessary will be issued by the department performing the work on which the report is based, and will be directed through channels to the Corporation's Medical Director and the Legal Department, and no other copy (except that of the issuing department) will be made. It will be the responsibility of the Department Manager orally to advise and consult with interested members of other departments.
4. Inquiries by Company Presidents and other interested parties as to the hazardous qualities of our products and recommended action thereon will be directed only to the appropriate person, department or committee designated in the Organization Circular entitled "Commercial Hazards Committee and Authorities for Determination of Commercial Hazards."

COPIES OF Executives, Department Heads, Plant Managers, District Managers
CIRCULAR: and General Managers of Foreign Subsidiaries.


President

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