



Shell Oil Company
Interoffice Memorandum

FEBRUARY 6, 1984

2/7/84 W.H. Thompson

	Return Document to File
	Record Copy in File
✓	Information Copy
	Record copy in <u>ECB</u> Satellite

PLAINTIFF'S EXHIBIT

SH-3538

cc: R.R. Erickson
H. L. Lee

FROM: MANAGER, HEALTH & SAFETY, MANUFACTURING & TECHNICAL, WE Hale
HEAD OFFICE R.L. Schliep

TO: MANUFACTURING LOCATION MANAGERS

ANACORTES	NORCO
DEER PARK	ODESSA
EL PASO	TAFT
GEISMAR	WILMINGTON
MARIETTA	WOODBURY
MARTINEZ	WOOD RIVER
MOBILE	

SUBJECT: HS&E GUIDELINES FOR APPLICATION AND REMOVAL OF
LEAD/CHROMATE-BASED COATINGS

The attached HS&E guidelines for Application and Removal of Lead/Chromate-Based Coatings has been approved by Manufacturing senior management and is being distributed to you for implementation. For reference, an HS&E guideline is:

"An indication or outline of appropriate internal actions to be taken throughout Shell relative to a particular subject. Those responsible for specific actions are expected to exercise judgment in use of the guidelines. However, selection of options within the guidelines and extent to which the guidelines are followed must be with the intent of achieving comparable results to those anticipated by the guidelines. HS&E Guidelines must be: 1) approved by the Vice President HS&E and the vice presidents or general managers of impacted organizations; 2) implemented, managed and reviewed in such a manner as to achieve effective operation."

While guidelines provide flexibility for implementation, there is expectation of equivalent performance. Since results are subject to confirmation by the "Compliance Assurance Review" mechanism, we suggest that a copy be placed in your location's copies of the Compliance Assurance Review Manuals along with distribution to those responsible for implementation. (A copy of the Compliance Assurance Review Manual distribution list is attached for reference.)

ABS-003296

LAM 0315667.068

Health & Safety, Manufacturing & Technical were represented on the task force which developed these guidelines. We plan to issue equivalent information as an addendum to our Health and Safety Procedure Guidelines (number 508 - "Safe Work Practices - Maintenance - Painting").



J. S. Szymanowski

KCC:PJW

Attachments

cc: H. L. Kusnetz
R. H. Brown

LAM 0315667.069

ABS-003297

GUIDELINES FOR APPLICATION/REMOVAL OF LEAD/CHROMATE-BASED COATINGS

The Task Force, after studying the information and data developed during the course of the project, has put together a set of guidelines for application and removal of lead/chromate-based coatings. It is the Task Force's intent that these guidelines will offer clear direction in maintaining regulatory compliance where use of lead/chromate-based coatings is deemed necessary. The Task Force recognizes that at present, in some applications (especially in offshore installations), there are not satisfactory substitutes for lead/chromate-based coatings. Each Shell location should review existing rules/procedures to ensure that these guidelines are incorporated.

1. Utilize lead/chromate-free coatings within the company unless significant surface protection is sacrificed by the use of such coatings. If a particular application requires use of lead and/or chromate-containing coatings, notification of the activity should be made to the appropriate health/safety group for action as required.
2. During application/removal of lead/chromate-based coatings, NIOSH approved respiratory protection equipment should be worn by all employees involved. For abrasive-blasting, this must be a properly fitted and maintained air-supplied hood with an uncontaminated air source. For application (spray-painting), a half-face cartridge respirator for organic vapors/dust, mist and fumes is required. In addition, chemical goggles are required for eye protection. Skin contact should be minimized, and employees should remove any gross amounts of coating from the skin immediately.
3. During application/removal of lead/chromate-based coatings, initial monitoring has indicated that lead/chromate exposure limits may be exceeded up to 50 feet downwind of the job site. The potential exposure zone should be clearly marked. All non-essential personnel should remain out of the area (other than passing through) while work is in progress. If this is not feasible, appropriate NIOSH approved respiratory protection (see #2) should be provided to personnel working within the area during application/removal (see also #4).
4. If Shell employees must work in the potential exposure zone during application/removal of lead/chromate-containing coatings, industrial hygiene monitoring may be appropriate, in addition to the respiratory protection. Measured exposure levels exceeding the OSHA PEL for lead or the ACGIH TLV for water-insoluble hexavalent chromium should be reported to Corporate Medical Department.

5. Shell is responsible for informing contractors of any potential hazards (of which it is reasonably aware) associated with lead/chromate-based coatings. Contractors are expected to utilize procedures which provide appropriate protection for their employees when involved with application/removal of these coatings.

Any requirements of the OSHA Lead Standard that apply to the application/removal of lead-based coatings are the responsibility of the contractor. Upon request, Shell will supply guidance to the contractor in meeting these requirements.

6. Residues from abrasive-blasting of lead/chromate-based coatings should be tested for lead and/or chromium content (by the EPA leachate test or applicable state agency test) to determine waste classification (if residue is to be removed from job site). This is not required in offshore work.

Distribution List

Operations

Vice President

Health and Safety - Operations - Manager

Environmental Conservation - Manager

Products Distribution - Operations Support - Manager.

Products Distribution - Operations Support - Contract

Terminals - Manager

Health and Safety - Products Distribution - Manager

Chemical Logistics Transportation Safety & Regulations - Manager

Domestic Raw Material Supply Terminal Operations - Manager

Marine - Marine Services - Manager

Manufacturing Locations

Deer Park Manufacturing Complex

Superintendent, Health and Safety

Manager, Safety - North

Manager, Safety - South

Manager, Employee Relations

Manager, Industrial Relations

Martinez Manufacturing Complex

Manager, Health and Safety

Manager, Employee Relations

Norco Manufacturing Complex

Superintendent, Health, Safety and Environment

Manager, Health and Safety

Manager, Employee Relations

Wilmington Manufacturing Complex

Manager, Safety and Industrial Hygiene

Manager, Employee Relations

Wood River Manufacturing Complex

Manager, Safety and Industrial Hygiene

Manager, Industrial Relations

Manager, Personnel

Anacortes Refinery

Manager, Safety

Manager, Employee Relations

Odessa Refinery

Safety Representative

Manager, Services

LAM 0315667.072

ABS-003300

El Paso Plant

Safety Representative
Manager, Services

Geismar Plant

Manager, Health, Safety and Environment
Manager, Employee Relations

Marietta Plant

Manager, Health, Safety and Environment
Manager, Employee Relations

Metairie Plant

Safety Representative
Manager, Employee Relations

Mobile Plant

Manager, Safety, Health and Environment
Manager, Employee Relations

Taft Plant

Safety Representative
Manager, Services

Woodbury Plant

Manager, Health, Safety and Environment
Manager, Employee Relations

Oil Products Distribution

Area - Managers

East	South
West	Midwest

Sewaren Plant - Manager

Willbridge Plant - Manager

Exploration and Production

Safety and Environmental Conservation - Manager (40)

Health, Safety and Environment

Vice President

General Manager

Environmental Affairs - Manager

Water Programs & Special Studies - Manager

Plans & Support - Manager

Product Safety and Compliance - Manager

Corporate Medical - Medical Services - Manager

Safety and Industrial Hygiene - Manager (6)

Information Services

LAM 0315667.073

ABS-003301

3 TYPES OF WORK

SCHEDULING

A-TICKET

B-TICKET NEXT DAY WORK

EMERGENCY TIMES

T. COONAN

DUPONT

D. GRACE

R. SNOOGRASS

G. BUCHANAN

Blasting can be stopped for jobs planned.

NOTE: → TOTTED ON LEAD (Protection

JIM BEDFORD

LAM 0315667.074

ABS-003302