NOTE: THIS IS ONLY A DRAFT. IT HAS NOT BEEN ADOPTED:

PLAINTIFF'S EXHIBIT

SUN-27

CORPUS CHRISTI REFINERY RESPIRATOR PROGRAM

I. General

All refinery personnel potentially exposed to respirable chemical contaminants will be fitted with a half-mask, cartridge respirator. Those individuals identified by the refinery physician as not medically capable of wearing a respirator will not be fitted.

II. Respirator Fit Program

All individuals identified as requiring a cartridge respirator will be fitted with two makes of respirators. Both respirator makes will meet the minimum requirements of the individual performing the fit testing. The choice of primary and secondary respirator will be left to the employee, based upon feel, respirator color, or any other individual criteria.

III. Respirator Issue

For reasons of program design, everyone will not be issued an individual respirator. When an employee needs a respirator, he or she should go to the area that has been set aside for issuing respirators for their work unit.

A. Operating shift personnel will obtain their proper respirators from their individual control rooms. Cabinets containing the units' respirators will be monitored for program compliance by the unit supervisor or his representative. A listing of personnel served out of each cabinet will show each individual's respirator make. When checking out a respirator, the individual should place a check mark beside his or her name for record keeping requirements of use. After a respirator is used, it should not be returned to the cabinet until the cartridges are replaced and the mask has been cleaned according to the guideline of Appendix B.

B. All other personnel should go to the Safety Department to check out their respirator when needed. Individual cards will be maintained there with the primary and secondary respirator types listed. After the individual identifies the need for a respirator, he should proceed to the adjacent room outside the Safety Office and look up his or her respirator type. The individual's card should be pulled and placed in the clothes pin that holds his primary or secondary respirator.

When the respirator is no longer needed, or at the end of the work day, which ever occurs first, the individual should return to the Safety Office and place the used respirator in the return can. The individual's fit card will be left in the respirator cabinet.

IV. Respirator Protection Available (Cartridge Selection)

Normally, most of the half-mask cartridge respirators found in the respirator issue cabinets, should have organic vapor cartridges in place and ready for use. These cartridges are not "cure-all" for every airborne contaminant found in this refinery. Other cartridge types are available from the Safety Department when needed. The manufacturer and type of cartridge is printed on the side of the cartridge. Each respirator type (A, B, C, ... etc.) must be matched with the cartridge manufactured for that respirator.

A. Organic Vapor Cartridge

This cartridge will protect you against only organic vapors such as benzene, toluene, styrene, cumene, any xylene, ethylbenzene and gasoline, to name a few. Your supervisor should be able to help identify any other chemicals of concern in the air that an organic vapor cartridge is effective against. The half-mask respirator should only be used in the open and not in an enclosed area or vessel that would have very high concentrations of contaminants. At all times, it should be remembered that no half-mask respirator supplies oxygen or air, but only functions to filter the contaminant before breathing. Like any filter, it can become depleted or it can be overwhelmed by high concentrations of organic vapors. If you smell the odor of an organic vapor when wearing a half-mask respirator, you either have a poor face fit, or are in vapor concentrations that are too high, or the organic vapor cartridges are saturated. You may require refitting of the mask or a supplied air system.

B. Organic Vapor and Acid Gas Cartridge

This cartridge will protect you against low concentrations of organic vapors, as described above, and from low airborne concentrations of chlorine (Cl_2), sulfur dioxide (SO_2), and sulfuric acid (H_2SO_4). This cartridge type should not be used for hydrofluoric acid (HF) or boron trifluoride (BF_3). As most of the respirators in the issue cabinets are supplied with only organic vapor cartridges, you will have to exchange them for the organic vapor-acid gas cartridges. A concerted effort on your part should be made to insure that they are put in carefully so as to not leak.

The respirator is not functioning properly if you detect any odor or nasal irritation when wearing this type respirator. If this is the case, you probably should use a supplied air system instead of the half-mask respirator.

IV. Respirator Protection Available (Continued)

b. Organic Vapor and Dust, Mist or Fume Cartridge

This cartridge type will protect you from organic vapors and any dusty condition, such as with asbestos removal, or particulate catalyst change out. This cartridge type will also protect you from fumes from welding operations.

The respirator is not functioning properly if you detect any odor or nasal irritation when wearing this type respirator. These cartridges, like all other cartridges, must be changed out after every shift in which they are used.

V. Respirator Use

Your supervisor or foreman will certainly aid you in identifying those work tasks in which a respirator is required, but you are primarily responsible for your own health and safety. If you decide in your own judgement that the current work assignment requires a respirator, you should procure one with the proper cartridge installed. Your supervisor or foreman can help you select the proper cartridge. If not, the Safety Department or Industrial Hygiene Department will help you choose the correct cartridge.

Sun Company has gone to great expense to set up this Respirator Program for your benefit. It will be of no benefit to you if the respirators are not used properly when needed. Every effort is made to allow you to work in this refinery with reduced risk to your health and well being. The respirators made available to you will protect you from injury only if it is used and worn as prescribed.

VI. Administration

Program Administration Officer: Paul Martiello
Program Advisor: Marc Powell

APPENDIX A

UNIT SUPERVISOR RESPIRATOR PROGRAM REQUIREMENTS

Each operating unit supervisor whose employees receive respirators for their own control will have primary responsibility for monitoring his unit's respirator program and insuring that it meets the standards called for in this program outline.

In particular, the unit supervisor will be responsible for the following:

I. Inventory and reordering of proper cartridges to keep in stock enough cartridges to insure adequate availability to meet the unit's needs for routine and emergency use. Cleaning supplies, such as soap and alcohol, must also be ordered to insure sufficient quantity on hand. All items will be ordered through the Safety Department.

II. Inspection of cabinets will be performed by the unit supervisor. The cabinets will be kep neat and orderly, and all respirators inside will have new cartridges installed and ready for immediate use. Nothing will be kept in the respirator cabinets except resoirators, extra cartridges, and other respirator supplies. The employee listing on the front of the cabinet will be monitored and kept up-to-date to reflect unit personnel changes.

III. The respirators will be insepcted at least weekly. Needed repairs or replacement information will be reported to the Safety Department. The inspection shall include:

A. Facepiece

1. Excessive dirt
2. Cracks, tears, holes, distortion from improper storage
3. Inflexibility (stretch and massage to restore flexibility)
4. Cracked or broken cartridge holders, badly worn threads, missing gaskets.

B. Head Straps

1. Breaks
2. Loss of elasticity
3. Broken or malfunctioning buckles and attachments

C. Exhalation Valve (Remove Valve Cover)

1. Foreign material such as detergent residue, dust, human hair under valve set
2. Cracks, tears, or distortion in the valve material
3. Improper alignment or insertion of the valve bocy in the facepiece
4. Cracks, breaks, or chips in the valve body, particularly in the sealing surface
5. Missing or defective valve cover
6. Improper installation of valve in the valve body

APPENDIX A

RESPIRATOR PROGRAM REQUIREMENTS

III. (Continued)

J. Cartridges

Wrong cartridge type in respirator - (Mismatching cartridge manufacturer and respirator manufacturer, or dust, fume and mist cartridge where organic vapor cartridge is needed.)

The responsibilities for carrying out the Unit Respirator Program may be delegated by the unit supervisor to another member of the unit staff. The program will be subject to periodic auditing by the Safety or Industrial Hygiene Departments.

Whenever a respirator is used for any period during a work shift, there are several items that must be accomplished before the respirator can be returned to the cabinet for reissuing. These items are required by federal law and will be accomplished. While each unit supervisor will assign the responsibility of how this will be carried out in each unit, it is recommended that the respirator user prepares his own used respirator.

Regardless of the procedure used in each unit, the following items must be accomplished at least every 24 hours:

A. The used respirators will be gathered from the used bin and the cartridges removed and disposed of.

B. The respirators will be washed with the provided detergent in warm water and thoroughly rinsed with clean tap water. Any respirator that does not appear to clean up easily with the detergent can be wiped thoroughly with isopropyl alcohol, followed by rinsing with clean water. Thoroughly rinsing away all detergent and alcohol is very important to prevent dermatitis.

C. The cleaned respirators should be left to air dry in a clean place. When dry, the respirator should be inspected for defective parts, cleanliness, and detergent residue left by inadequate rinsing. Detergent residue most often appears under the seat of the exhalation valve and can cause valve leakage or sticking.

D. After inspecting, the clean, dry respirator should have new cartridges installed. Like manufacturer's cartridges must go in a like manufacturer's respirator. The respirator will then be returned to the proper place in the cabinet.

E. Any respirators found with defective parts will not be placed in the cabinet. The Safety Department will be called and the defective respirator will be identified so that a replacement can be made available at the earliest opportunity.

APPENDIX C

STANDARD OPERATING PROCEDURE
CARTRIDGE RESPIRATOR FIT TESTING
[illegible] COMPOSITE REFINERY

1. Half-mask and full-face cartridge respirators will be used for this test.

2. The test will be performed in an area where there is no noticeable air movements.

3. A cotton swab or tissue will be saturated with iso-amyl acetate (banana oil).

4. Prior to testing, the test subject will don a respirator. The tester will visually inspect the fit of the respirator. An obvious leak in the facepiece to face seal shall be reason to abort the test on that respirator and a record made as to that make respirator being unsatisfactory. A statement by the test subject as to significant discomfort shall also be reason to abort the test.

5. The saturated cotton swab shall be moved slowly around the entire sealing surface of the respirator. The swab should be close to the facepiece - face seal but not touch either. Leakage, as evidenced by a declaration of odor detection, shall be cause to classify that respirator as unsatisfactory.

6. An apparently satisfactory respirator will be further tested by the use of a ventilation smoke tube. The test subject will be instructed to close his eyes and breathe normally. The smoke will be generated and directed around the entire sealing surface of the mask. Leakage at any time will be cause to terminate the test and record the respirator make as unacceptable.

7. Certain information will be gathered about each test subject.

   a. Full name
   b. Social security number
   c. Supervisor
   d. Whether corrective lens are required
   e. Primary respirator
   f. Secondary respirator
   g. No fits

APPENDIX C

CARTRIDGE SELECTION

Cartridge	For Air-borne Hazard	Conditions of Use
Organic Vapor (OV)	Benzene Cumene Ethylbenzene Toluene Styrene Xylene Carbontetrachlorice Gasoline Vapors Polymethylbenzenes Curene Any Other Aromatic Hydrocarbon	Cartridges must be replaced at end of each work shift in which they are used. For use only in the ope Never in enclosed vessels or areas of very high concentration.
OV Cartridge with prefilter	For All the Above and: Asbestos Silica from sandblasting Catalyst Dusts Needle Coke	The filter pad and O.V. cartridge must be disposed of and replaced at the end of each work shift in which they are used. The plastic retainer covers should not be discarded, but they are to be reused.

DO NOT use the Organic Vapor Cartridge, Half Mask Respirator for Protection Against of the Following:

Ammonia	H_2S (Hydrogen Sulfide)
BF_3 (Boron Trifluoride)	Organo-Lead (TML, TEL)
HF Acid (Hydrogen Fluoride)	Carbon Monoxide (CO)