



Dow U.S.A.

The Dow Chemical Company
Freeport, Texas 77541

January 25, 1991

John Murphy, B-101

xc:

CEP CONSOLIDATED AUDIT - OCCUPATIONAL HEALTH - RESPONSES

The following are our responses to the recommendations from the 11/27/90 audit:

1. Ensure that all Industrial Hygiene training documentation is thoroughly detailed as to its type and content. (Example enclosed)

WILL COMPLY.

2. Utilize the portable "Hearing Protection Required" signs when maintenance activities exceed 90 dBA. (Example - Sandblasting Operations.)

DONE - LETTER TO BLOCK PERSONNEL RESPONSIBLE FOR WRITING PERMITS.

3. Ensure all ventilation systems are on a P/PM schedule. (See attached ppm worksheet).

DONE - CALLED GENE 1/2/91. HE WILL TAKE CARE OF THIS.

4. Industrial Hygiene Services will provide proper wording for labeling of containers that hold vinyl chloride. (See

DONE.

5. Job procedures should be updated to reflect changes in respiratory protection.

DONE.

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6. When updating the PPE and written respirator programs, consult Industrial Hygiene for model programs. These programs can be referenced/contained within the Emergency Response Plans.

WILL COMPLY.

IS PRESENTLY SETTING UP A MEETING.

7. Ensure that off-site laundering companies have been notified of potential contaminants via a cover letter and appropriate Material Safety Data Sheets.

WILL COMPLY.

8. Ensure asbestos containing materials are inspected every six months for signs of deterioration.

WILL COMPLY.

9. Ensure that annual training for all assigned respirator users follow the training guidelines as outlined in the Respirator Protection Manual dated 2/88. (respiratory Protection Manual 2/88, page 11, IX Training is enclosed).

WILL COMPLY.

If you have any questions, please contact me at X-2868.

H. Janke

Harry Janke
Superintendent
Chlorinated Ethane Products

Approved: _____

R. A. Jones
Production Manager
COP/Phenol

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