

COOK, DAVIS & MCFALL

ATTORNEYS AT LAW

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909 FANNIN, SUITE 2600

HOUSTON, TEXAS 77010-1003

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RECEIVED

JUN 17 1987

KERRY CARL HAGAN

June 16, 1987

ROBERT C. FLOYD

Ms. Frances Bennett
District Clerk
Brazoria County Courthouse
400 North Velasco
Angleton, Texas 77515

Re: Cause No. 86-G-2460; Erma Faye Harris, et al vs. Dow
Chemical Company, et al; In the 239th Judicial District
Court of Brazoria County, Texas

Dear Ms. Bennett:

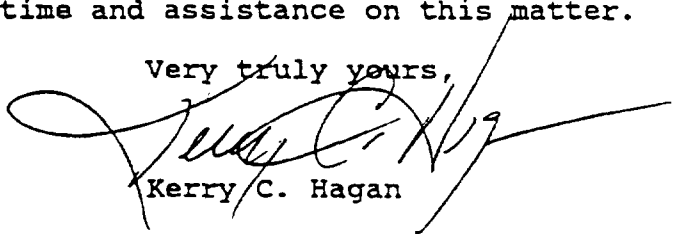
Enclosed for filing, please find Defendant, Combustion
Engineering, Inc.'s Answers to Plaintiff's Interrogatories.

Please file mark the enclosed extra copy of the
above-referenced pleading and of this letter and return to us in
the enclosed stamped, self-addressed envelope.

By copy of this letter, all interested parties of this
lawsuit have been notified of this action.

Thank you for your time and assistance on this matter.

Very truly yours,


Kerry C. Hagan

KCH:jb
Enclosure
CE38 (30.)

cc: All counsel of record

ST0010481

NO. 86 G 2460

ERMA FAYE HARRIS, INDIVIDUALLY)	IN THE DISTRICT COURT OF
AND AS NEXT FRIEND OF WESLEY)	
HARRIS, A MINOR, BETTY HARRIS)	
ALLEN, PHYLLIS HARRIS KIRBY)	
AND JAMES HARRIS,)	
ADULT CHILDREN)	BRAZORIA COUNTY, TEXAS
VS.)	
THE DOW CHEMICAL COMPANY,)	
ET AL)	239TH JUDICIAL DISTRICT

ST0010482

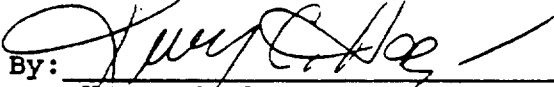
DEFENDANT COMBUSTION ENGINEERING, INC.'S
ANSWERS TO PLAINTIFF'S INTERROGATORIES

TO: Erma Faye Harris, Individually and as next friend of Wesley Harris, a minor, Betty Harris Allen, Phyllis Harris Kirby and James Harris, adult children, Plaintiff herein, by and through her attorney of record, J. Ronald Tucker, 1100 Leeland, Houston, Texas 77002-7697.

Pursuant to Rule 168, of the Texas Rules of Civil Procedure, Defendant Combustion Engineering, Inc. hereby serves upon Plaintiff in the above cause these answers to interrogatories propounded by the Plaintiff in this cause.

Respectfully submitted,

COOK, DAVIS & McFALL

By: 

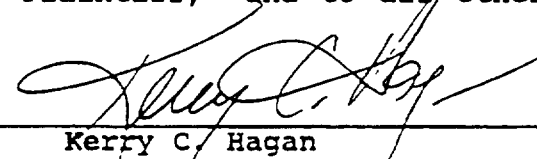
Kerry C. Hagan
State Bar No. 08684500
Two Houston Center
909 Fannin, Suite 2600
Houston, Texas 77010-1003
713/757-0440

Attorneys for Defendant,
Combustion Engineering, Inc.

ST0010183

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of June, 1987,
Defendant's Answers to Plaintiff's Interrogatories have been
forwarded to counsel for Plaintiff, and to all other counsel
of record.


Kerry C. Hagan

Interrogatories

1. Does your company manufacture asbestos insulation or asbestos containing materials? If the answer is yes please describe in full, exact and precise detail what products you manufacture or have ever manufactured in the past, giving the dates that those products were manufactured and the brand name under which those manufactured asbestos containing products were marketed.

Answer: No.

2. Please state the beginning date on which your company began manufacturing asbestos and/or asbestos containing products and list each year after that date which your company manufactured asbestos and/or asbestos containing products, giving the brand names under which the products were marketed in each year and if your company has stopped manufacturing such products, give the date on which said products were last manufactured or produced.

Answer: See Exhibit "A" attached hereto.

3. Please state your name, official title, address, and the capacity in which you are answering these interrogatories.

Answer: Richard D. O'Connor, Director, Valley Forge Services, Combustion Engineering, Inc., P. O. Box 828, Valley Forge, Pennsylvania.

4. Please state the name, address and occupation of any and all parties who contributed any information to the answering of these interrogatories.

Answer: See answer to interrogatory no. 3 and Frank T. Christenson, Former Assistant to Vice President of Industrial Sales, C-E Refractories, Combustion Engineering, Inc., Valley Forge, Pennsylvania.

5. Did this Defendant, between the years of 1951 and present, manufacture and/or sell and/or furnish asbestos containing products for use by Dow Chemical Company and/or Dow Badische and/or Badische Corporation? If the answer is yes, please list the dates upon which such products were furnished and/or sold to Dow Chemical Company, Dow Badische, and/or Badische Corporation and attach any and

18701001S

all sales invoices for asbestos containing products to these companies.

Answer: This Defendant had no sales to Badische Corporation or to Dow Badische. This Defendant has records of one sale to Dow Chemical Company of \$50.85 worth of Stic-Tite. This was made in 1971 in Ohio.

6. Give the name and trade name of all types of asbestos containing materials manufactured or sold by you, giving the dates that you began to manufacture or sell such materials. Include for each a description of the materials, including the asbestos and silica content.

Answer: See Exhibit "A" attached hereto.

7. Before placing your asbestos containing products on the market, did you make, or cause to be made, any studies to determine whether your products would be hazardous to persons who would be handling them? If so, please state what study, or studies were done, by whom and what dates.

Answer: No.

8. When was your company first aware that asbestosis could occur among workers who were exposed to the inhalation of asbestos fibers from products manufactured or sold by you?

Answer: 1969, exact date unknown.

9. What steps were instituted to prevent damage or further damage to the workers exposed to asbestosis?

Answer: In 1969, warning labels were placed on the packaging of all asbestos containing products. Defendant required production employees in its own plants to wear respirators when working with asbestos; and, in 1972 Defendant discontinued the manufacture of all asbestos-containing products.

10. Has your company been sued prior to this occurrence for any claim related to asbestos damage? If so, state:

a. Cause number and style of the case

B. City, county and state where filed

ST 0010485

- c. List all parties to the suit
- d. List all attorneys involved in the suit
- e. The result of the suit
- f. The dates of such filings.

Answer: Defendant objects to this interrogatory on the grounds that the answer, if given, would be entirely irrelevant to any of the issues involved in this case, and would not be likely to lead to the discovery of relevant evidence. This Defendant has been involved in an excess of 40,000 asbestos cases throughout the United States, each case having multiple parties and the claims made by the various plaintiffs vary markedly from case to case. To require Defendant to prepare the information requested would be entirely burdensome, harassing to this Defendant in view of the possible relevancy of the material provided, and would be extremely expensive.

11. Have you ever been fined or otherwise forced to take corrective action regarding asbestos hazards as a result of an inspection by OSHA or any other governmental agency? If so, state when and by what agency.

Answer: No.

12. a. How many current and previous employees of your company have made a claim or claims for damages as a result of exposure to asbestos prior to 1987?
- b. List each employee or former employee and give the date of such claim and the disposition of the claim.

Answer: There have been a few workman's compensation claims, the first one having been made in 1973. Defendant does not have records of such claims.

13. In accordance with Rule 166b2(d)(1), please state the name, address and telephone number of any expert witness(es) whom you intend to call upon to testify in your behalf in the trial of this cause and for each such expert, a brief synopsis of the expected testimony and subject matter said expert(s) will be testifying to.

Answer: Defendant will supplement this answer at such time as experts have been determined.

14. Do you maintain an OSHA log at your facility? If so, how many years do you keep such logs? In answering this interrogatory, please attach copies of all such logs as you have in your possession or under your care, custody and/or control.

Answer: No. In addition, during most of the time this Defendant manufactured asbestos-containing insulation products, OSHA was not in existence.

15. Please list your chief safety engineers or other type safety officers for the years 1951 to present with complete addresses for each such person.

Answer: During the time this Defendant manufactured asbestos-containing insulation products, i.e. from mid 1963 through 1972, it had no designated safety engineers or officers.

16. What type of warnings regarding the dangers inherent in working around asbestos were disseminated to your employees from the time your company first became aware of the dangers of asbestos through the present? In answering this interrogatory, please attach true, correct and complete copies of all such warnings.

Answer: See answer to interrogatory no. 9 and Exhibit "B" attached hereto.

17. What safety measures and devices such as respirators, were implemented to protect your employees and required after your company first became aware of the dangers of asbestos and what years such measures and devices were required.

Answer: See answer to interrogatory no. 9.

18. What type of decontamination procedures were instituted, and when, to reduce the risk of exposure to asbestos of your employees?

Answer: See answer to interrogatory no. 9.

19. Please list your workers compensation carrier and address of same for each year from 1951 through the present.

ST 0010487

Answer: During the time that this Defendant manufactured asbestos-containing insulation products, its workman's compensation carrier was Travelers Insurance Company, Hartford, Connecticut.

20. Has your company ever been a member of any of the below listed organizations or associations? If yes, give the dates in which your company was a member of each organization.

- a. Therman Insulation Manufacturer Association, Inc.
- b. National Insulation Manufacturers Association, Inc.
- c. Asbestos Insulation Association.
- d. Asbestos Textile Institute.
- e. Industrial Hygiene Foundation of America or its successor, Industrial Health Foundation.

S10010188

Answer: No.

21. Prior to 1960, did you or your predecessor ever have any labor inspectors or anyone from your company whose job it was to go into areas where your products were being used or installed, to make a dust level count? If so, state when this procedure started, the purpose of such procedure, and what action, if any, was taken in response to these findings.

Answer: Defendant has no predecessors as it understands that term, and Defendant did not manufacture asbestos-containing products prior to 1960.

22. Please state whether or not any division of your company or subsidiary engaged in any activity involving the use of asbestos or asbestos products, had any claims for lung diseases or death from lung disease attributable from asbestosis, mesothelioma, lung cancer, broncogenic cancer or metastatic carcinoma. If the answer is yes, give the name of such employees and attach copies of such claims.

Answer: See answer to interrogatory no. 12.

23. Has your company, or its predecessor, ever conducted any studies concerning the effects of the inhalation of

asbestos dust fibers on one using or being exposed to any of the asbestos materials manufactured, sold, or distributed by you. If your answer is yes, give the date and nature of such studies, the name of the persons conducting such studies, the purpose of the study(ies), and attach a copy of any report based upon studies.

Answer: No.

24. State the year that this Defendant, or any predecessor, was first advised of either threshold limit values, or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienist, and state the name of the employee-official of the company receiving such advice and attach copies of the instrument communicating such advice.

Answer: Defendant is unaware of the exact date of such communication if it did, in fact, occur.

25. When do you contend the state of the medical literature was such that you had a duty to warn persons exposed to asbestos containing products or asbestos dust that such exposure could cause severe, disabling lung disease, including but not limited to, chronic obstructive pulmonary disease, asbestosis, mesothelioma, carcinoma and/or chronic bronchitis?

Answer: Defendant contends that it had no duty to warn of alleged harmful effects of asbestos exposure until OSHA published regulations in that regard. However, this Defendant did, in fact, warn of the dangers of asbestos product prior to that time when it learned of the potential health hazards associated with such products.

26. Does Defendant contend that asbestos products can be manufactured so as to eliminate all potential health hazards to workers working with them? If yes, explain fully.

Answer: Defendant does not have sufficient scientific knowledge with which to answer this interrogatory and therefore it objects to this interrogatory.

27. Is it possible for a layman to distinguish your asbestos containing products from those manufactured or distributed by your competitors when such products have been removed

from their container or containers? If so, please describe how you contend your product can be distinguished from those of a competitor.

Answer. Defendant is unaware of the physical characteristics of products manufactured by other defendants and therefore cannot answer this interrogatory, nor can it answer as to what a layman would find to be distinguishable.

28. Was such threshold limit value or maximum allowable concentration inquired about in interrogatory no. 25 total dust or just asbestos dust?

Answer: Defendant assumes that this interrogatory refers to the inquiry in interrogatory no. 24. See answer to interrogatory no. 24.

29. Please state what percentage of the total market for asbestos and/or asbestos containing products, including asbestos insulation your company has realized from the date which your company first began manufacturing and marketing asbestos containing products and each year thereafter, until the present date or until the date that you last manufactured these products. In answering this interrogatory, answer first on the basis of nationwide sales and secondly, on the basis of sales within the State of Texas, either direct sales, or sales through distributors and/or retailers.

Answer: At one time, Defendant made an attempt to estimate its national market for asbestos product. As best as could be determined, at no time was Defendant's percentage of the national market in excess of one-tenth of one percent. Defendant has never attempted to estimate its market share in Texas, and could not do so without knowing the total market of Texas which would include all manufacturers.

30. What relationship has existed since 1951 and continuing to the present, between your company and Dow Chemical Company and/or Dow Badische and/or Badische Corporation? In answering this interrogatory, give the information for each year from 1951 to 1987.

Answer: See answer to interrogatory no. 5.

ST0010190

THE STATE OF PENNSYLVANIA
COUNTY OF MONTGOMERY

BEFORE ME, the undersigned authority, on this day personally appeared Richard D. O'Connor, Director of Valley Forge Services, Combustion Engineering, who, being by me duly sworn, upon oath stated that he is authorized to make this Affidavit on its behalf, and that each of the foregoing answers to Plaintiff's Interrogatories is true and correct.

Richard D. O'Connor
Affiant

SIGNED AND SWORN TO before me on 15, JUNE, 1987.

Carlo H. Jensen
Notary Public in and for
Monterey County, California

My Commission Expires:
EARL O. DIJENNO, JR., Notary Public
Plymouth Twp., Montgomery Co
My Commission Expires Nov. 20, 1988

Printed name of Notary

C.30
KCH/rg

164010015

SERVICE LIST

Re: Cause No. 86-G-2460; Erma Faye Harris, Individually and as
Next Friend of Wesley Harris, a Minor, Betty Harris Allen,
Phyllis Harris Kirby and James Harris, Adult Children vs.
The Dow Chemical Company, et al; In the 239th Judicial
District Court of Brazoria County, Texas

Attorney for Plaintiffs:

J. Roland Tucker
J. Roland Tucker & Associates
Powell Building
1100 Leeland
Houston, Texas 77002-7697

Attorney for Defendants:

Mr. Raymnd T. Matthews
3600 Two Houston Center
909 Fannin
Houston, Texas 77010

Mr. Wilton Chaulker
Lorance & Thompson
303 Jackson Hill
Houston, Texas 77007

Mr. Frank Harmon, III
Crain, Caton, James & Womble
3300 Two Houston Center
909 Fannin
Houston, Texas 77010

Mr. Robert C. Floyd
Floyd, Taylor & Riley
1301 McKinney Street, Suite 3660
Houston, Texas 77010

Ms. Martha Lawley
Ryan & Shoss
1331 Lamar, Suite 1560
Houston, Texas 77010

Mr. Jeffrey Scott
Giessel, Stone, Barker & Lyman
2700 Two Houston Center
909 Fannin
Houston, Texas 77010

ST0010492

COOK, DAVIS & MCFALL

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RECEIVED

JUN 19 1987

June 18, 1987

ROBERT C. FLOYD

KERRY CARL HAGAN

Ms. Frances Bennett
District Clerk
Brazoria County Courthouse
400 North Velasco
Angleton, Texas 77515

Re: Cause No. 86-G-2460; Erma Faye Harris, et al vs. Dow
Chemical Company, et al; In the 239th Judicial District
Court of Brazoria County, Texas

Dear Ms. Bennett:

Enclosed for filing, please find Exhibits "A" and "B" of
Defendant, Combustion Engineering, Inc.'s Answers to Plaintiff's
Interrogatories, which were inadvertently left out when this
pleading was submitted to your office on June 16, 1987.

Please file mark the enclosed extra copy of this letter and
return to us in the enclosed stamped, self-addressed envelope.

By copy of this letter, all interested parties of this
lawsuit have been provided with copies of these exhibits.

Thank you for your time and assistance on this matter.

Very truly yours,

Kerry C. Hagan

KCH:jb
Enclosures
CE38 (31.)

cc: All counsel of record

ST0010493

CE ans HWT

ST0010494

<u>INSULATING BLOCK</u>		C-E START	ESTIMATED STOP	PERCENT AND TYPE OF ASBESTOS	<u>CONTAINER</u>
(m) #12 Insulating Block (R)		1963	1966	6.2 (A)	Cardboard Carton
(m) #19 Insulating Block (R)		1963	1966	4.6 (A)	Cardboard Carton
(m) Griptex* Mineral Wool Block (R)		1964	1972	2.0 (C)	Cardboard Carton
(m) Kaiser M. Block (D)		Unknown	1971	2.0 (C)	Cardboard Carton
<u>INSULATING CEMENTS</u>					
(m) Stic-tite* (R)-(D)		1963	8/30/72	38.6-42.2 (C)	50 lb. bags
(m) Super Stic-tite (R)-(D)		1963	8/30/72	9.89-10.2 (C)	50 lb. bags
(m) Super Finish Stic-tite (R)		1963	6/27/72	11.5-13.1 (C)	50 lb. bags
(m) Super Finish (R)		8/10/65	1/10/68	14.2 (C)	40 lb. bags
(m) Super 711 (D)		1964	6/27/72	13.7 (C)	50 lb. bags
(m) Kaiser Plastic Insulation (D)		1964	1971	13.7 (C)	50 lb. bags
(m) Utility Thermal Finish Cement (D)		1964	2/28/72	5.0 (C)	50 lb. bags
(m) Kaiser Hard Top (D)		1964	2/28/72	5.0 (C)	50 lb. bags
(m) Casing Cement (D)		1964	1969	5.0 (C)	50 lb. bags
(m) MHD Finishing Cement (D)		1964	1968	68.03 (C)	50 lb. bags
(m) Pyroscat* Fireproofing Cement (D)		1964	6/8/72	3.0 (C)	50 lb. bags
(m) Hillite Insulating Cement (D)		1964	1968	9.1 (C)	50 lb. bags
(m) A-1199 Insulating Cement (R)		1963	1966	43.4 (C)	50 lb. bags
(m) SDK 50 (R)		1963	1966	0.4 (A)	50 lb. bags
(m) Buck Stay Cement A-1360 (R)		1965	1966	0.8-1.54 (A)	50 lb. bags
(m) Castabloc* (R)		1965	1/19/66	1.2 (A)	50 lb. bags
(m) Stirrup Cement (R)		1965	1966	42.7 (C)	50 lb. bags
(m) Calcrete 30 (D)		1964	1970	7.8 (C)	50 lb. bags

ST0010495

<u>MISCELLANEOUS PRODUCTS</u>		<u>C-E</u> <u>START</u>	<u>ESTIMATED</u> <u>STOP</u>	<u>PERCENT AND</u> <u>TYPE OF</u> <u>ASBESTOS</u>	<u>CONTAINER</u>
(m) Block Stick (R)		1963	6/28/72	22.0(C)	6 gal. steel containers
(m) Guninsul (R)		1963	1966	Approx. 1.0(A)	50 lb. bags
(m) Mix A (R)		1963	6/27/72	6.0(C)	40 lb. bags
(m) Fibrous Adhesive (D)		1964	1965	15.0(C)	steel containers
(m) Hy-Temp Felexible Cement (R)		1963	1972	30.0(C)	5 gal. steel containers
(m) Expansion Joint Material (R)		1963	1966	100.0(A)	25 lb. bags
<u>INSULATING REFRACTORIES</u>		<u>C-E</u> <u>START</u>	<u>ESTIMATED</u> <u>STOP</u>	<u>PERCENT AND</u> <u>TYPE OF</u> <u>ASBESTOS</u>	<u>CONTAINER</u>
(m) Light Wate 22 (W)		1969	6/26/72	10.0(C)/ 27.0(C)	50 lb. bags
(m) Light Wate 50, (W)		1969	1972	10.0(C)	50 lb. bags
<u>PRODUCTS DISTRIBUTED BY C-E</u>					
(d) Asbestos Rope		1964	1965	100.00(C)	tied 100 ft.
(d) Permiseal (fibers in emulsion)		1964	1974	Approx. 3.0(C)	5 & 54 gal. steel containers

ST0010496

<u>MISCELLANEOUS PRODUCTS</u>	<u>C-E</u> <u>START</u>	<u>ESTIMATED</u> <u>STOP</u>	<u>PERCENT AND</u> <u>TYPE OF</u> <u>ASBESTOS</u>	<u>CONTAINER</u>
(d) Weatherkote (fibers in emulsion) (Thermalkote since 1976)	1963	1977	Approx. 3.0(C)	5, 30 & 55 gal. steel containers
(d) Duriseal (fibers in emulsion)	1964	1973	Approx. 3.0(C)	5, 30 & 55 gal. steel containers
(d) Thermal Coat (fibers in emulsion)	1964	1964	Approx. 3.0(C)	5, 30, 55 gal. steel containers
(d) Air Check (fibers in emulsion)	1963	1971	Approx. 3.0(C)	5, 30 & 55 gal. steel containers

KEY:

- (R) - R & I; Port Kennedy, Pennsylvania
- (D) - Detrick; Aurora, Illinois
- (W) - Walsh; St. Louis, Missouri
- (m) - manufactured
- (d) - distributed
- (C) - containing chrysotile
- (A) - containing amosite
- (*) - Trademark

MCC01(01.)

ST0010497

Excessive

fibers. This product contains asbestos fibers. Excessive

CAUTION: This product contains asbestos fibers. If adequate ventilation is

inhalation of asbestos may be harmful. If adequate ventilation is

nor possible, wear respirators approved by U.S. Bureau of Mines.

EXHIBIT "B"

X-23-58 some swelling but no evidence
of inflammation. Pat. is weak.
Gly. etc.

H. K. Tracy

ST0010684



DOW HOSPITAL
FREEPORT, TEXAS

11794

REPORT OF ACCIDENT

A.F.A.

ALONE

OCCUPATION

FOREMAN

DATE

CLOCK NO

TELEPHONE

NAME OF PATIENT

AGE

ADDRESS

PERMANENT ADDRESS

RELATIVE OR FRIEND

ADDRESS

EMPLOYER (IN COMPENSATION CASE)

PATIENT'S STORY AND WHERE INJURED

DATE

HOUR

WITNESSES

HOW BROUGHT TO HOSPITAL

NATURE AND EXTENT OF INJURIES

TREATMENT AND DISPOSITION OF CASE

EST. DISABILITY

DATE DISABILITY BEGAN

PRE-EXISTING DISEASE OR INJURY

FRIENDS NOTIFIED BY

POLICE OR CORONER NOTIFIED BY

NURSES

BILLED

DOW
HOSPITAL

HOUR

ATTENDING PHYSICIAN

ST0010685

Form 500-2 Rev.

TEXAS DIVISION
THE DOW CHEMICAL COMPANY

ACCIDENT REPORT

#12652
NAME Harris, Geo. W.

COMPANY DOW-A

OCCUPATION Metal Tapper

LOCATION Wg. Coils

BADGE No. 43-30 FOREMAN David

TREATMENT:

DATE OF ACCIDENT 11-22-64 12 5:00

Reported to Low Hosp. treated
same date.

NATURE OF INJURY:

Crushed 1st shin.

HOW DID ACCIDENT HAPPEN:

Cutting end out of wire of bath when
end of wire coil cut and hit rt. shin.

DATE 11-25-64 TIME 3:30 AM PM

☒ RETURN TO WORK ☐ SENT HOME ☐ XX

UNSAFE ACT OR CONDITION:

ST0010687

ST0010688

510-26 REV 8-53

DOW

THE DOW CHEMICAL COMPANY
TEXAS DIVISION

DOW HOSPITAL ACCIDENT NO. _____
WHEEPORT, TEXAS P. A. N. _____

TO FIRST AID OFFICE #12652

RETURN TO WORK REPORT

EMPLOYER _____ DEPT. _____
(NAME OF EMPLOYER) DADGE NO. _____

MAY RETURN TO WORK ON _____

☒ FULL DUTY ☐ LIGHT DUTY FOR _____

SIGNED _____ (PHYSICIAN)

HE RETURNED TO WORK ON _____

- LIST
- ☐ CLIMBING LADD
 - ☐ OPERATING MACH
 - ☐ LIFTING, PULLI
 - ☐ STANDING, PAI
 - ☐ EXPOSURE TO P
 - ☐ METAL DIPPING
 - ☐ WORK IN TANKS
 - ☐ GROSS SUSTAIN
 - ☒ KEEP INJURED
 - ☐ WEAR SAFETY C
 - ☐ DRIVE MOVING
 - ☐ AVOID SKIN CON
 - ☐ RUBBER GLI
 - ☐ LIQUID CHEM
 - ☐ POWDERED C
 - ☐ OTHERS

PATIENT TO REPORT TO
UPON COMPLETION OF LIST

ST0010689

LIGHT DUTY RESTRICTIONS

- ☐ CLIMBING LADDERS OR SCAFFOLDS
- ☐ OPERATING MOVING MACHINERY
- ☐ LIFTING, PULLING, OR PUSHING OVER _____ LBS.
- ☐ STANDING, WALKING, KNEELING OVER _____ % OF TIME
- ☐ EXPOSURE TO FUMES OR DUST
- ☒ METAL DIPPING
- ☐ WORK IN TANKS OR CONFINED AREAS
- ☐ GROSS SUSTAINED EXERTION
- ☒ KEEP INJURED PART DRY
- ☐ WEAR SAFETY GLASSES AT ALL TIMES
- ☐ DRIVE NO VEHICLES
- ☐ AVOID SKIN CONTACT WITH
 - (1) RUBBER GLOVES OR BOOTS
 - (2) LIQUID CHEMICALS (TYPE) _____
 - (3) POWDERED CHEMICALS (TYPE) _____
 - (4) MORDERED SOAPS
 - (5) OTHERS _____

PATIENT TO REPORT TO HOSPITAL EMERGENCY ROOM FOR REEVALUATION
UPON COMPLETION OF LIGHT DUTY AND BEFORE RETURN TO FULL DUTY.

300-10 NEW, 8-55

THE DOW CHEMICAL COMPANY

DOW

TO: FIRST AID OFFICE

EMPLOYEE

George W. [Signature]

MAY RETURN TO WORK ON _____

DATE _____

TIME _____

BY: _____

RETURN

ST0010690

SW-12 REV. 8-53

THE DOW CHEMICAL COMPANY
TEXAS DIVISION

DOW HOSPITAL
FREEPORT, TEXAS

ACCIDENT NO. _____
DATE _____

RETURN TO WORK REPORT

TO: FIRST AID OFFICE

EMPLOYEE: George W. Harris

DATE OF INJURY: 7/17/54

TIME OF INJURY: 1:00 PM

LOCATION OF INJURY: Plant

DESCRIPTION OF INJURY: Hand

DATE OF REPORT: 7/17/54

REPORTED BY: George W. Harris

APPROVED BY: _____