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TEXAS OPERATIONS

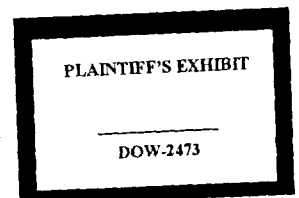
SAFETY RULE

SECTION 6, RULE 4

CLEANING EQUIPMENT

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IT IS THE RESPONSIBILITY OF THE OWNER OR GENERATOR
TO ENSURE THAT THE INTENT OF SAFETY RULE G-4 IS
BEING ENFORCED PRIOR TO DISPOSAL OF VESSELS,
EQUIPMENT OR OTHER MATERIAL.

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WHERE IS SAFETY RULE G-4 APPLICABLE?

- TRANSFERS FROM ONE PLANT TO ANOTHER.
 - TRANSFERS OF SURPLUS MATERIAL TO MATERIAL RECOVERY.
 - WOOD IN WOOD DEMPSTERS.
 - SCRAP METAL SHOULD BE CLEANED AND DISPOSED PER ENVIRONMENTAL STANDARD ES-316.
 - ALL USED DRUMS PER ES-317.
 - USED AUTOMOTIVE BATTERIES TO PLANT A GARAGE (A-901) AND PLANT B GARAGE (B-203). MANY OTHER BATTERIES ARE CLASSIFIED AS RCRA HAZARDOUS WASTE AND SHOULD BE DISPOSED OF FROM UNIT THRU ENVIRONMENTAL SERVICES AND ENVIRONMENTAL OPERATIONS.
 - OIL IN FULL STRENGTH AND PCB CONTAMINATED TRANSFORMERS.
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- ALL MATERIALS THAT CANNOT BE DECONTAMINATED MUST BE DISPOSED AS CONTAMINATED MATERIAL PER INSTRUCTIONS FROM ENVIRONMENTAL SERVICES.
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CLEANING REUSEABLE EQUIPMENT

THINGS TO CONSIDER:

- EQUIPMENT SHOULD BE CLEAN OF ALL CHEMICALS AND FREE-FLOWING LIQUIDS, EXCEPT AS INDICATED BELOW.
- MINOR AMOUNTS OF CONTAMINANTS SUCH AS OIL FILMS, GREASE, CONCRETE, PLASTICS, ETC. ARE ACCEPTABLE.
- INSULATION SHOULD BE REMOVED FROM ALL EQUIPMENT.
- ALL EXPOSED GASKETS ON VALVES, PIPE, AND EQUIPMENT SHOULD BE REMOVED (MAJORITY CONTAIN ASBESTOS).
- VALVES SHOULD BE IN OPEN POSITION.
- ENOUGH CONNECTIONS, FLANGES, OR MANWAYS MUST BE OPEN FOR INSPECTION. (ABSOLUTELY NOTHING SHOULD BE COMPLETELY CLOSED.)
- FILTER CARTRIDGES, TOWER PACKING, DESSICANT, FILTER BAGS, ETC. ARE TO BE REMOVED UNLESS PRIOR PERMISSION HAS BEEN GRANTED BY MATERIAL RECOVERY.
- SAFETY RULES, ENVIRONMENTAL CONCERNS, AND LIABILITY CONSIDERATIONS MUST BE ADDRESSED BY INDIVIDUAL UNITS SENDING MATERIALS OUT TO BE REPAIRED (PUMPS, SEALS, VESSELS, VALVES, INSTRUMENTS, ETC.).
- REMOVE CHEMICALS AND OTHER MATERIALS FROM FILE CABINETS, DESKS, STORAGE CABINETS, ETC. (CABINETS MUST BE UNLOCKED).

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DISPOSAL OF CLEAN, DECONTAMINATED
SCRAP METAL
PER ENVIRONMENTAL STANDARD ES-316

- FOLLOW CLEANING PROCEDURES FOR REUSEABLE EQUIPMENT.
- A TORCH SHOULD BE USED TO CUT A HOLE (9"x9" MINIMUM) IN SIDE OF VESSEL TO BE SCRAPPED. THIS WILL ENSURE THAT FLAMMABLES HAVE BEEN ADEQUATELY REMOVED AND ALLOWS FOR BETTER INSPECTION.

THE FOLLOWING PROCEDURE SHOULD BE FOLLOWED IN PREPARING HEAT EXCHANGERS FOR SCRAPPING:

- A) CLEAN AS NECESSARY
- B) REMOVE BOTH HEADS
- C) REMOVE ALL TUBE PLUGS
- D) CUT TWO HOLES IN SHELL AT EACH END, CLOSE TO TUBE SHEET (MATERIALS MAY LEAK FROM TUBE SIDE TO SHELL SIDE AND THEN POLYMERIZE).

ITEMS NOT TO BE PLACED IN RECYCLE SCRAP METAL DEMPSTERS

- METAL MATERIALS SUCH CANS, BUCKETS, DRUMS, AEROSOL CANS, CYLINDERS, TRANSFORMERS, AND OTHER MISCELLANEOUS CONTAINERS (NO CONTAINERS OF ANY TYPE).
- SINCE IT IS VERY DIFFICULT AND TIME CONSUMING TO DETERMINE WHETHER CONTAINERS HAVE BEEN DECONTAMINATED, ALL CONTAINERS SHOULD BE PLACED IN A CONTAMINATED METAL DEMPSTER AND SHIPPED TO LANDFILL AT ENVIRONMENTAL OPERATIONS. USED DRUMS SHOULD GO TO DRUM WASHING PER ES-317.
- INSULATION, CONCRETE, GLASS, PLASTIC, WOOD, RUBBER, TRASH, FLOOR SWEEPINGS, ETC.

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MATERIAL RECOVERY
RECEIVING GUIDELINES

1. DETERMINE IF ANY OF THE COMPONENTS HAVE FURTHER VALUE TO DOW
(CALL MATERIAL RECOVERY PRIOR TO BEGINNING DISMANTLING PROCESS
OR SENDING ANY SURPLUS MATERIAL TO MATERIAL RECOVERY).

KEY RESOURCE PEOPLE AT MATERIAL RECOVERY WHO ARE AVAILABLE TO
ANSWER QUESTIONS ARE:

WAYNE BRADY	5368	WALT NOACK	3128
GEORGE MASON	3129	L.L.(SONNY) SURY	2102
MARTHA KEITH	5370	LAMAR PETERSON	3120

2. PLACE A TAG ON EACH MAJOR ITEM AND/OR PALLET OF MATERIAL GIVING
AS A MINIMUM CONTACT NAME AND PHONE NUMBER AND PREVIOUS SERVICE.
3. REMEMBER TO:
1. REMOVE OIL AND INSULATION FROM ALL EQUIPMENT, MOTORS,
AND SCRAP METAL.
 2. CLEAN AND/OR DECONTAMINATE ALL MATERIALS PRIOR TO
SHIPPING TO MATERIAL RECOVERY OR PLACING IT IN A SCRAP
METAL DEMPSTER.
4. AVOID SHIPMENT OF MATERIAL IN LARGE CRATES AS MUCH AS
PRACTICAL. MOST MIXED MATERIALS IN LARGE CRATES CANNOT
BE ECONOMICALLY SEPARATED. ALSO MUCH PROBLEM MATERIAL IS
LOCATED IN THE BOTTOM OF THESE CRATES.

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