

Box 3, File 2

PLAINTIFF'S EXHIBIT

Box #2

DOW-778

**Industrial Hygiene Asbestos Removal
1988-1989**

**Industrial Hygiene Report
Texas Operations**

	Author	Date
344. Evaluation of Employee Exposures to Asbestos During Removal Operations, Utilities Distribution A, Texas Operations, 1986	D. D. Hicks	04-21-88
345. Evaluation of Employee Exposures During Asbestos Gasket Operations, CEP/CMF Maintenance Departments, A-1800 and A-2400, Texas Operations, 1987	D. D. Hicks	04-21-88
346. Evaluation of Contractor Work Habits Using Area Monitoring for Asbestos During a Transite Board Removal Project at Texas Operations-Magnesium Casting A, (A-629), on March 22 and 30, 1988	R. J. Reda	05-17-88
347. Evaluation of Short-term Exposure to Asbestos During Insulation Removal, B-5400 Block	J. L. Bell	06-28-88
348. Asbestos Monitoring During Removal from the Stairwells in the A. P. Bartel Building, APB Maintenance, B-1201	L. F. Bullard	06-29-88
349. 1988 Evaluation of Airborne Concentrating During Asbestos Removal at the APB Building	M. J. Sorrells	09-23-88
350. 1988 Evaluation of Potential Exposures to Asbestos During Transite Removal Jobs for Major Unit Demolition, B-5401	M. J. Sorrells	11-18-88
351. Asbestos Monitoring During Transite Modification at B-1313 by the Plant B Carpenters	C. L. Sandlin	12-19-88
352. Asbestos Monitoring During Transite Modification at B-6803 by the Plant B Carpenters	C. L. Sandlin	12-19-88
353. Asbestos Monitoring During Transite Removal at A-1128 for Plant A Refrigeration	C. L. Sandlin	12-19-88
354. Asbestos Monitoring During Transite Modification at Machine Shop, B-105, December, 1988 by the Plant B Carpenters	R. L. Wooster	01-04-89
355. Evaluation of Contractor Work Procedures During A Transite Removal Project at Magnesium I	R. J. Reda	02-10-89
356. Asbestos Monitoring During Transite Removal at Fabrication Shop, B-105, by the Plant B Carpenters	R. L. Wooster	03-09-89
357. Evaluation of Contractor Employee Exposures to Asbestos During Removal of Piping While Doing a Hot Gas Pass Inspection for the Critical Turbine Equipment Department	C. L. Sandlin	07-10-89

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Industrial Hygiene Asbestos Removal
1988-1989

358.	1988-89 Asbestos Area and Personal Monitoring Results During Transite, Pipe Insulation and Mastic Removal Jobs for Major Unit Demolition, B-5401	M. J. Sorrells	08-10-89
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Industrial Hygiene Sampling Records	Plant	Date
359. Asbestos Monitoring	CEP/CFM	01-14-87 02-05-87
360. Removing Pipe Insulation	Major Unit Demolition	03-08-89 04-18-89
361. Mastic Stripping	Major Unit Demolition	03-28-89 04-27-89
362. Removing Insulation from Pipes	Major Unit Demolition	04-11-89
363. Removing Insulation from a Pipeway	Major Unit Demolition	04-17-89 05-17-89
364. Glovebagging Pipe Insulation	Major Unit Demolition	03-08-89

Name of Document	Location	Date
365. Procedure For Removing Asbestos Transite	B-6801	
366. Procedure For Removing Asbestos Insulation from Pipe Lines West Side	A-612	
367. Asbestos Safety Checklist Section XI Remove Transite	A-612	10-24-88
368. Asbestos Abatement Audit Checklist Section XII Transite Removal	B-2513	11-14-88
369. Asbestos Abatement Audit Checklist Section XII Glove Bagging Pipe With Asbestos Insulation	B-4200	11-18-88

	Author	
370. Letter to Ms. Minerva DeLeon Re: Notification of Intent to Renovate According to EPA National Emissions Standard 40 CFR 61	K. F. Licklider	03-02-88
371. Pump Flow Rate Calibration Record	J. S. Hinton	06-09-89 06-13-89
372. Pump Flow Rate Calibration Record	M. J. Sorrells	05-30-89
373. Lab Analysis Report from McKee Fiber Counts - Asbestos	Ronald S. McKee	01-06-88
374. Lab Analysis Report from McKee Fiber Counts - Asbestos	Ronald S. McKee	11-27-88

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Robertson, W. J.	Rt. 1 Box 202 Groveton, TX 75845
Robfield, E. B.	
Robinson, J. E.	Box 894 Sweeny, TX 77480
Robinson, L. L.	Rt. 9 Box 509 Conroe, TX 77302
Rogers, W. R.	
Roland, M. V.	205 Magnolia Lake Jackson, TX 77566
Rollo, J. N.	
Roper, W. H.	1908 Ave. G Freeport, TX 77541
Rosenkranz, J. H.	Rt. 4 Box 603 Muldrow, OK 74948
Rosenkranz, W. A.	106 Southern Oaks Dr. Lake Jackson, TX 77566
Rosewell, J. L.	
Ross, B. W.	496 James St. Clute, TX 77531
Ross, F. E.	
Ross, J. E.	310 Oak Lake Jackson, TX 77566
Ross, L. A.	P.O. Box 331 Mauriceville, TX 77626
Rost, D. R.	1331 W. 6th Freeport, TX 77541

ST0010185

<u>Employee</u>	<u>Address</u>
Rothe, E. M.	
Roundtree, E. J., Jr.	420 Lazy Lane Brazoria, TX 77422
Rouse, C. M.	
Rouse, L. L.	
Rowland, J. W.	
Rowley, J. A.	
Royalty, C. A.	
Rozzle, T. O.	
Ruhmann, C. B.	112 N. Oak Dr. Columbus, TX 78934
Rumfield, E. B.	
Runnels, R. B., Jr.	128 Collier Clute, TX 77531
Rutherford, F. N.	
Ryan, L. H.	
Ryberg, R. L.	906 Sycamore Lake Jackson, TX 77566
Sadler, I. H.	
Safford, D.	
Sanders, G. T.	

ST0010186

<u>Employee</u>	<u>Address</u>
Sanders, J. D.	Rt. 2 Box 92 Franklin, TX 77856
Saucier, W. E.	
Sawyer, J. E.	
Scheffer, L. R.	1401 6th St. Rosenberg, TX 77471
Scherdin, J. R.	120 Wisteria Lake Jackson, TX 77566
Schimming, K. L.	Box 1074 Clute, TX 77531
Schlitzkus, H. J.	Rt. 1 Box 94 Damon, TX 77430
Schonert, B.	Rt. 2 Box 98 Bronson, TX 75930
Schroller, L. F.	Box 911 Brazoria, TX 77422
Schubeck, E. L.	
Schwebel, J. M.	Rt. 3 Box 30 Brazoria, TX 77422
Scott, B. L.	1944 N. Ave. H Freeport, TX 77566
Scott, C. E.	
Scott, E.	Rt. 1 Box 69 Angleton, TX 77515
Scott, J. A.	
Scott, V. L.	1703 W. 9th Freeport, TX 77541
Scott, W. J.	146 Atwood Rt. 1 Freeport, TX 77541

ST0010187

<u>Employee</u>	<u>Address</u>
Scrogin, H. B.	
Seale, D. H.	7422 Buckskin San Antonio, TX 78227
Seamster, T. O.	
Sebesta, F. A.	Rt. 1 Box 83 Rosenberg, TX 77471
See, Otis	
Sefcik, F. W.	
Seligman, W. E.	
Sellers, O. J.	
Sepulvado, M. M.	401 Springfield Dr. Rt. 2 Angleton, TX 77515
Seward, C. E.	
Sewell, E. L.	
Sexton, W. A.	
Shannon, W. E.	
Sheffield, E. B.	
Shelley, E.	
Shelton, G. W.	
Shepard, J. G.	Rt. 3 Box 3830 Brazoria, TX 77422

ST0010188

<u>Employee</u>	<u>Address</u>
Sherman, R. L.	1529 W. 9th Freeport, TX 77541
Sherrouse, A. D.	
Shoemaker, K. R.	
Shull, L. E.	311 Mulberry Rt. 4 Brazoria, TX 77422
Simmons, W. E.	4350 Willowood Vidor, TX 77662
Simon, T. J.	
Simpson, E. E.	215 Jasmine Lake Jackson, TX 77566
Sims, A. A.	
Sims, J. R.	3109 12th St. Bay City, TX 77414
Sims, J. W.	Rt. 1 Box 81 Damon, TX 77430
Sims, R. W.	
Sines, R. W., Jr.	
Sipe, J. Y.	
Skinner, P.	
Slade, T. D.	211 Fitz Alvin, TX 77511
Slater, H. K.	
Slayton, J. J.	

ST0010189

<u>Employee</u>	<u>Address</u>
Sloan, C. P.	
Slocum, E. A.	
Sloma, W. Y.	
Smith, A. H.	
Smith, B. B.	129 W. Mulberry Angleton, TX 77515
Smith, B. D.	
Smith, C. J.	4910 Macridge Houston, TX 77045
Smith, C. L.	Rt. 2 Box 2936 Brazoria, TX 77422
Smith, D. L.	P.O. Box 45424 Houston, TX 77245
Smith, G. D., Jr.	
Smith, L. C.	132 Lakewood Clute, TX 77531
Smith, L. L.	
Smith, L. R.	515 Center Way Lake Jackson, TX 77566
Smith, R. C.	
Smith, R. B.	
Soles, J. A.	
Somers, J. B.	1814 N. Ave. G. Freeport, TX 77541

ST0010190

<u>Employee</u>	<u>Address</u>
Sorrels, L. V.	
South, R. L.	
Sparks, R. M.	
Spates, F. C.	
Spradley, N. W.	621 Kyle Angleton, TX 77515
Stanley, D. W.	
Stavinoha, A. B.	2509 First St. Rosenberg, TX 77471
Steffen, G. E.	
Stevens, B. W.	
Stevens, W. M.	616 Center Way Lake Jackson, TX 77566
Stewart, A. L., Jr.	
Stiles, D. E.	
Stolarsky, J. F.	Rt. 3 Box 408 Angleton, TX 77515
Stone, J. H.	
Stovall, D. M.	
Stowe, W. B.	
Strauss, W. D.	435 Southern Oaks Dr. Lake Jackson, TX 77566

ST0010191

<u>Employee</u>	<u>Address</u>
Strebeck, D. E.	
Strong, I. M.	The Thicket, Box 44 Edinburg, TX 78539
Stuckey, J. R.	
Suchma, C. A.	
Summers, D. R.	
Sury, J. C.	
Swearingen, J. D.	P.O. Box 521 Brazoria, TX 77422
Sykora, G. H.	612 Sycamore Lake Jackson, TX 77566
Syler, L. A.	
Tackett, F. W.	
Tanner, C. W.	
Tanner, F. M.	
Tanner, H. J.	722 W. 8th St. Freeport, TX 77541
Tannery, V. V.	
Tarbell, O. E., Jr.	
Tarrant, F. D.	Rt. 1 Freeport, TX 77541
Tarver, H. M.	Box 220 Terlingua Lodge Alpine, TX 79830

ST0010192

<u>Employee</u>	<u>Address</u>
Tarver, H. R.	Rt. 1 Freeport, TX 77541
Tatum, A. J.	
Taylor, A. B.	
Taylor, F.	
Taylor, F. A.	
Taylor, H.	
Taylor, J. E.	Box 312 Lake Jackson, TX 77566
Taylor, J. J.	
Terrill, T. W.	
Theriot, H.	
Thiele, O. W.	
Thomas, N. O.	
Thomas, T.	Rt. 6 Box 5130 Nacogdoches, TX 75961
Thompson, A. O.	
Thompson, H. G.	Rt. 1 7031 SFA Freeport, TX 77541
Thompson, W. T.	Rt. 6 Box 736A Alvin, TX 77511
Throop, C. B.	

ST0010193

<u>Employee</u>	<u>Address</u>
Tipton, F. M.	1105 Nottingham Angleton, TX 77515
Tipton, J. I.	
Todd, D. G.	915 W. 7th Freeport, TX 77541
Todd, D. M.	202 Winding Way Lake Jackson, TX 77566
Todd, L. F.	
Todd, L. L.	
Todd, P. J.	
Tolbirt, L. L.	
Tolman, K. D.	
Tomlinson, H. P.	
Trammell, J. E.	
Transier, G. W.	
Travis, J. A.	1931 N. Ave. G Freeport, TX 77541
Traw, J. D.	
Tripulas, G. G.	
Trout, W. B.	106 Hand Ln. Brazoria Rd. Lake Jackson, TX 77566
Truitt, E.	

ST0010194

<u>Employee</u>	<u>Address</u>
Trussell, C. B.	
Tumlinson, J. W.	
Tunnell, J.	
Turner, H. B.	Rt. 1 Box 89 Angleton, TX 77515
Turner, J. C.	
Twiner, H. W.	
Vallot, O.	
Vanden, L. C.	
Van Slyke, V. P.	
Vasut, L. E.	
Venable, C. R.	
Vick, E. F.	
Viktorin, J. B.	
Waggenspack, H. J.	
Wagner, J.	
Wagner, J. H.	
Wagner, R. J.	

ST0010195

<u>Employee</u>	<u>Address</u>
Wagner, R. W.	
Wailles, J. F.	
Walden, L. P.	
Walker, B. A.	
Walker, C. B.	
Walker, E.	
Walker, H. G.	
Walker, W. V.	524 Holly Angleton, TX 77515
Wallace, J. G.	
Waltrip, M. A.	
Ward, M. E.	Box 61 Brazoria, TX 77422
Ware, R. M.	
Warner, C. O., III	617 E. Lorraine Angleton, TX 77515
Warner, M. F.	Rt. 4 Box 4166 Brazoria, TX 77422
Warny, N. F.	407 Bell West Columbia, TX 77480
Warren, J. C., Jr.	3 North Ave. C Freeport, TX 77541
Waters, L. W.	

ST0010196

<u>Employee</u>	<u>Address</u>
Watson, W. L.	
Watts, F. W.	
Watts, R. E.	
Weathers, P. G.	
Webb, D. L.	
Webb, E. C.	
Webb, E. L.	
Webb, L. R.	
Weeden, O. A.	
Welborne, T. M.	
Wells, C. L.	Box 135 Brazoria, TX 77422
Wentworth, A. K.	
West, A. E.	
West, R. M.	
Westbrook, W. J., Jr.	
Westermann, V. W.	
Wetherell, C. B.	104 Hickory Lake Jackson, TX 77566

ST0010197

<u>Employee</u>	<u>Address</u>
Wheeler, H. M.	
Whiddon, W. R.	
Whipple, F. F.	
White, B.	
White, J. F.	801 N. Arcola Angleton, TX 77515
Whiteker, C. W.	205 Chestnut Lake Jackson, TX 77566
Whitley, J. R.	
Whitt, L. B., Jr.	
Wicke, C. D.	
Wieghat, L. H.	Box 295 Needville, TX 77461
Wier, B. L., Jr.	Box 324 Brazoria, TX 77422
Wilcox, C. L.	
Wilde, E. L.	
Wiley, L.	
Wilkinson, W. D.	
Wilkerson, W. F.	
Will, B. A.	

ST0010198

<u>Employee</u>	<u>Address</u>
Williams, C. E.	
Williams, D. W.	331 W. Broad Freeport, TX 77541
Williams, G. W.	
Williams, L. B.	109 Sleepy Hollow Lake Jackson, TX 77566
Williams, T. W.	
Williams, W. D.	208 Laurel Lake Jackson, TX 77566
Willis, J. M.	
Willy, E. F.	223 N. Shady Oaks Lake Jackson, TX 77566
Willy, R. P.	
Wilson, C. B.	110 Sleepy Hollow Dr. Lake Jackson, TX 77566
Wilson, J. E.	
Wilson, J. E., Jr.	
Wilson, H. V.	
Wilson, S. D.	
Wilson, T. H.	
Wilson, W. R.	
Wilson, W. W.	P.O. Box 361 Lake Jackson, TX 77566

ST0010199

<u>Employee</u>	<u>Address</u>
Wilt, R. F.	108 Fort Ave. Keyser, WV 26726
Windle, R. L.	
Winfrey, P. M., Jr.	1018 W. 6th Freeport, TX 77541
Wise, O. L.	737 E. Kyle Angleton, TX 77515
Wise, R. W.	
Wisener, B. F.	
Wisenor, C. T.	
Wixom, R. H.	
Wolfe, O. J.	601 E. Cedar Angleton, TX 77515
Wood, F. H.	
Wood, J. A.	Rt. 1 Box 270 Freeport, TX 77541
Wood, W. H.	Box 572 Lake Jackson, TX 77566
Woodall, F. T.	
Woodiel, C. C.	Rt. 1 Freeport, TX 77541
Woodruff, S. A., Jr.	
Wooster, W. F.	
Wright, E. J.	

ST0010200

Employee

Address

Wright, R. R., Jr.

Yancey, J. H.

Yates, P. K.

Zengerle, B. A.

Zimmer, H. H.

ST0010201

ANDREWS & KURTH

ATTORNEYS

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CABLE: ANKUR HOU
TELECOPIER (713) 220-4295
TELEX: 79-1208

June 3, 1982

Mrs. Frances Bennett
District Clerk
Brazoria County, Texas
Angleton, Texas 77515

Re: Cause No. 81-G-1331; Barbara Meyer vs. Johns-Manville
Sales Corporation, et al in the 239th Judicial District Court
of Brazoria County, Texas

ST0010126

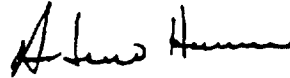
Dear Mrs. Bennett:

Enclosed herewith please find the original plus one (1) copy of Defendant, The Dow Chemical Company's, Answers to Plaintiff's Interrogatories, which we would appreciate you filing with the court in the above-referenced cause of action. Please date stamp the extra copy of this instrument and return to me in the envelope provided for my file.

By carbon copy of this letter, I am forwarding a copy of this instrument to counsel of record for the plaintiff in this case.

Thank you for your assistance and cooperation in this matter.

Yours truly,



Andrew S. Hanen

169:sfm
Enclosures

cc: Talmadge Boyd, Esq.
Williams & Boyd
The Main Building, Suite No. 500
1212 Main Street
Houston, Texas 77002

CERTIFIED MAIL NO. P226 816176
RETURN RECEIPT REQUESTED

4,
FREE ON

Mrs. Frances Bennett
June 3, 1982
Page Two

bcc: Edward A. Aldous, Esq.
Legal Department
The Dow Chemical Company
Texas Division
Freeport, Texas 77541

Mr. Jack H. Barber
Claims Representative
Texas Employers' Insurance Association
1231 West Highway 332
Clute, Texas 77531

Claim No. 25-81-70009

Ms. Shirley J. Moore ✓
Legal Assistant
The Dow Chemical Company
Legal Department
Freeport, Texas 77541

ST0010127