

DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	1
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

I. CLEAN AIR ACT

A. Permits/Registered Sources

- | | | |
|--|--|-----|
| 1.a. Current air permits to construct/operate, including the underlying permit application and support information, key correspondence and compliance schedules. <i>(Include previous permits only when referenced by the current permit).</i> | L plus 1 | # |
| 1.b. Permit reports and basic data supporting permit reports.

[§111, 112, 40 CFR 51 and 52. Also C and D, §160-169,-171-178] | 6 | # |
| 2. Annual Air Permits fees <i>(unless other State requirement)</i> | 2 or as required by local law, if longer | NP |
| 3. Permit Conformance tests | 6 | DR |
| 4. Withdrawn permit applications | 6 | DR |
| 5. Registered Sources
Grandfathered sources - not permitted | | DCT |
| Information to register
Source Certificates

[§111, 112, 40 CFR 51.165, 52.24, 52.21] | 6
Current Year | |
| 6. Compliance Inspection Records, notice of violation

[§114 and 110] | 6 | DCT |
| 7. Consent Orders/Compliance Agreements | For duration of effect on Dow | |

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8. Records of Accidents/Emissions from startups /shutdowns/malfunctions - reports to Agency <u>(Except those subject to litigation which will be retained pursuant to §1001 "Claims and Litigation")</u>		3	NP		
[§110 and subsections]					
B. Air Pollution Surveys (in-house) (Only verifiable data should be maintained)			DC		
1. Ambient Air/Meteorological/ Climatological		10	NP		
2. Process emission data [C and D of the Act]		5	DC		
3. Vegetation damage (incidents)		5	DR		
C. Emission Inventory (Report to State and raw data to support Emission Inventory)		10	NP		
1. Basis for Calculation Methods, when not incorporated in a required record with a different retention		Until Superseded			
[§110]					
D. Prevention of Significant Deterioration (PSD)					
1. Sources and Emissions for Baseline Determination		L plus 1	DR		
[40 CFR 51]					
2. Permits, Supporting reports and final permit monitoring		L plus 1			
E. Bubble alternative applications/determinations. Emission banking data and determination		5	DR		
[40 CFR 52]					

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F. NESHAPS (National Emission Standards
for Hazardous Air Pollutants Sources)
(Prior to a Title V Operating Permit)

3

After obtaining a Title V Operating Permit

5 or as specified in the
permit, whichever is
longer

[§112]

G. Incineration Test Burns

6

DC

H. State Implementation Plans

NP

Compliance schedules for sources

6

DCT

I. NSPS (New Source Performance
Standards)
(Prior to Title V Operating Permit)

3

After obtaining a Title V Operating Permit

5 or as specified in the
permit, whichever is
longer

[§111]

J. Documentation of Exemptions

Life of facility plus 5, or 5
after exemption ends
whichever is less

K. All records not otherwise specified

3

II. ANALYTICAL AND QUALITY ASSURANCE/QUALITY CONTROL

This section governs the retention of analytical data and QA/QC records which have been generated by or at the request of environmental personnel, and which support the development and verification of the permitted activities of a facility under the various laws and regulations mentioned throughout this schedule.

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THE DOW CHEMICAL COMPANY

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This information may be generated by:

- Laboratories affiliated with the environmental service units and environmental operations units at a Dow site;
- Other Dow laboratories at the site;
- Outside laboratories under contract to the environmental function.

[Note: Schedule 861 requires that the original copies of all essential laboratory records be maintained in either a central departmental or central laboratory file location.]

A. ANALYTICAL RECORDS

1. Central Files

Originals of all records generated during a sampling and subsequent analysis (includes, but is not limited to: custody documents, photographs, field work sheets, chromatograms, computer printouts, strip chart readouts, calculation sheets lab reports; excludes items mentioned in paragraph A.3.)

In accordance with the for purpose within Schedule 861 which the work was done

Examples: Instrument checks and standardization, control charts, check sample results, QC letters and miscellaneous information (ex. refrigerator temperature logs).

[A2LA requirements for environmental laboratory accreditation under ISO/IEC Guide 25-1990]

2. Analyst's files

a. Analytical data in progress (analyst's possession)

Until completed

b. Analytical data completed

2 after completion

3. Notebooks/Databooks

See Section 1501

a. Bound notebooks which have been assigned an identification number (includes field logs, laboratory notebooks, research notebooks, instrument maintenance logs, standard prep logs)

50 after being closed out

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b. Notebooks dedicated to a specified project or type of analysis (e.g., biomonitoring study, NPDES permit monitoring) which have not been assigned an identification number.		See Paragraph A.1			
B. QUALITY ASSURANCE/QUALITY CONTROL RECORDS					
1. QA/QC documents which support any results reported to a regulatory agency (includes DMR-QA studies).		See Paragraph A.1			
2. Dow-sponsored inter-laboratory uniformity studies		3 after completion			
3. QA audits and assessments of special projects, Dow laboratories, or contract laboratories (Not otherwise regulated)		See II.A.1.			
4. Procedures, Standard Operating Procedures (SOPs), Operating Discipline Documents (ODDs)					
a. Current copy		Until superseded			
b. Obsolete versions (must be filed separate from current versions)		Permanent**			
[ISO/IEC Guide 25-1990 for accreditation of laboratories]					
[A2LA requirements for environmental laboratory accreditation under ISO/IEC Guide 25-1990]					
** or as required by regulation or certification authority, if shorter than permanent.					
5. Analytical data not associated with permits (i.e. drinking water)		5			
III. ANNUAL BUREAU OF THE CENSUS QUESTIONNAIRE RESPONSES					
		F Plus 1		DR	

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IV. ANNUAL POLLUTION ABATEMENT REPORT <i>(Includes MA-200)</i>		5 - See Section 675	DC		
V. COAST GUARD INSPECTION REPORTS		5	NP		
VI. CRITICAL MATERIALS USAGE, REPORTS AND DATA REPORTED TO AGENCY		10	DR		
VII. DOW ENVIRONMENTAL EVALUATIONS					
A. U.S. Area Environmental "Assessments" <i>(Pre-1991)(Predecessor to U.S. Area Compliance Audits)</i>		Destroy Immediately			
B. U.S. Area Environmental Compliance Audits or Environmental Assessments/Consolidated Audits <i>(Conducted in the plants & operating units of The Dow Chemical Company or subsidiaries by Environmental and Health Regulatory Affairs and/or Environmental Services personnel)</i>					
1. Draft Audit Report		Destroy Upon Completion of Final Written Report			
2. Final Audit Report		Until Superseded, Max 5			
3. Corrective Action Plan(s)		Until Superseded, Max 5			
4. Audit Working Papers <i>(includes pre- audit questionnaire)</i>		Upon Receipt of Corrective Action Plan or 6 Months after Destruction of Draft Report whichever comes first			
5. Status Reports		Upon Completion of Corrective Action Plan			
6. Follow-up Audit Report		Same as Final Report			

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C. Compliance Improvement Program
(Utilized by personnel of Dow operating units to achieve and maintain environmental compliance)

- | | |
|---|-----------------|
| 1. Environmental Compliance Checklist | Current Year |
| 2. Monthly Deficiency Tracking Sheets | Current Month |
| 3. Monthly Data Plots (Div & Mgt area) | Current Year |
| 4. Multi-Year Plots | 3 |
| 5. Compliance Assessment Findings | Current Quarter |
| 6. Compliance Assessment Follow-Up List | Current Quarter |

D. Dow Audits of External Treatment, Storage, Disposal or Recycle (TSDR) Firms *(Audits are completed by Dow Environmental Services or Environmental and Health Regulatory Affairs personnel)*

Until Superseded, max 10

- | | |
|-------------------|---------------------------|
| 1. Working Papers | Upon Completion of Report |
|-------------------|---------------------------|

E. Due Diligence (Company Authorization Policy Article IX) Audits *(These audits can be conducted by Dow Environmental personnel or hired outside contractors under guidance of U.S. Operations, in conjunction with Division and/or Corporate Legal)*

This article shall cover all transactions involving real property including but not limited to, gifts; leases, whether Dow is lessor or lessee; sale or purchase transactions; easements; and mergers, acquisitions, or divestitures involving real property assets.

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1. Final Audit Report (<i>notes, records and reports</i>)		3 beyond last contract obligation as to Divestiture or contractual benefit if an Acquisition			
2. Due Diligence Reviews Related to Article IX Transactions but no transaction		1			
3. Division Due Diligence Audits (<i>These audits are conducted by Environmental Services personnel for Donations, Easements, Right-Of-Ways, Leases and Licenses. The documentation may contain maps, written reports and background data.</i>)		3 beyond last contract obligation as to Divestiture or contractual benefit if an Acquisition.			
F. Environmental Review of Contract Manufacturing Facilities (<i>Conducted by Area or Division Environmental and Legal personnel coordination with U.S. Operations. They will review contract manufacturing, blending, formulating and similar operations performed by others for Dow.</i>)		5			
VIII. ENFORCEMENT ACTIONS BY GOVERNMENT AGENCIES (EPA, OSHA, FDA, ETC.)					
A. Retain contents relating to enforcement action until case is closed					
B. Closed - Resolved/settled (<i>except dispositive documents</i>)		1			
C. Closed - Unresolved (<i>except dispositive documents</i>)		4			
D. Dispositive documents (<i>ie consent decree, final judgment, settlement agreement</i>)		25			
IX. ENVIRONMENTAL IMPACT STATEMENTS		P		NP	
Baseline Studies					

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X. ENVIRONMENTAL INCIDENTS/INCIDENT LOG

Citizen complaints/Damage claims/ Investigation reports (<i>internal/external</i>)	5	DR
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(Significant citizen complaints, etc. may be transferred to a claims file for a longer than 5 year retention, See Legal Section 1001/Claims)

For Statistical Reporting of Environmental Incident Data	See XXIII F
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XI. FEDERAL INSECTICIDE, FUNGICIDE AND RODENTICIDE ACT

A. Pesticide Disposal Records

[40 CFR §169.2(l)]

Name of material, quantity, location and method of disposal	20	DR
--	----	----

Containers Disposed	20	DR
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The EPA will accept a statement from a responsible firm official describing in general terms the method and location of disposal for containers that are periodically taken to a certain site.

XII. COMMON DOW RECORDS See Section 628

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RECORD NAME					

XIII. GROUNDWATER RECORDS

Our groundwater records are primarily under RCRA. See RCRA/D/VI/2. They are also generated under Superfund. See Superfund/CERCLA/4.

- A. Groundwater records include many other records than the analytical results of groundwater samples from the monitoring wells like:

Note: Records retained in order to comply with RCRA and regulations promulgated there under must be reviewed at the purge date to determine whether they must be relabeled and retained to comply with internal Dow policy (*on-site or off-site disposal records*).

1. Monitoring Wells
Inventory, location, number, depth, up or down gradient, well construction.

P

[40 CFR 264.97(c) & 265.91(a)]

2. Sampling and Analysis Plan
Sample preparation, containers, preservation, shipment, chain of custody, elevation of groundwater in well during sampling, analytical methods, quality assurance of methods, accreditation of laboratory.

Closure plus 5 or Post
Closure if necessary

[40 CFR 264.97(d) & 265.92(a)]

3. Statistical Procedure (*Student-t-test*) To determine if analytical results exceed background levels or concentration limits.

Closure plus 5 or Post
Closure if necessary

[40 CFR 264.97(h) & 265.93(b)]

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4. Background Concentrations/
Quality Concentration levels of
each RCRA hazardous
constituent in upgradient
monitoring well/s.

Closure plus 5 or Post
Closure if necessary

[40 CFR §264.92, 264.93, 264.94
and 265.92]

5. Hydrogeological reports for
facility and surrounding land/flow
and direction of groundwater.

P

B. Monitoring Programs

1. Interim Status Facilities
Ground Water Monitoring
(Subpart F)
Recordkeeping and reporting
(Note: *TSR's post-closure time is
equal to operational time of unit*)

Closure plus 5 (*TSR's*) or
Closure plus Post-
Closure/minimum
30 (*Disposal facilities*)

[40 CFR §265.94]

- a. Quarterly Reports (*1st yr*)
(*Establish initial background
concentrations or parameters
values for each monitoring
well*)

Closure plus 5 (*TSR's*) or
Closure plus Post-
Closure/minimum
30 (*Disposal facilities*)

[40 CFR §265.91, .92, .94]

- b. Annual Report (*after 1st yr*)
Groundwater quality

Closure plus 5 (*TSR's*) or
Closure plus Post-
Closure (*Disposal
facilities*)

[40 CFR §265.92(b)(d)]

- c. Semi-Annual Report
Groundwater contamination.

Closure plus 5 (*TSR's*) or
Closure plus Post-
Closure (*Disposal
facilities*)

[40 CFR §265.92(b)(3),(d)]

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Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION
d. Groundwater Quality Assessment Plan		Closure plus 5 (TSR's) or Closure plus Post- Closure (Disposal facilities)		
[40 CFR §265.90(d), 265.93]				
e. Annual Report Notice (Informing Reg. Admin. a facility may be affecting groundwater quality)		Closure plus 5 (TSR's) or Closure plus Post- Closure (Disposal facilities)		
[40 CFR §265.93(d)(1)]				
* Note: B1 records are candidates for retention in B2 when your facility gets its Part B permit.				
2. Permitted Facilities Releases from Solid Waste Management (Subpart F)		Closure plus 5 (TSR's) or Closure plus Post- Closure (Disposal facilities)		
Written notification to Reg. Admin. (of significant increase of indicator parameters or hazardous constituents)		Closure plus 5 (TSR's) or Closure plus Post- Closure (Disposal facilities)		
Application for permit modification to Reg. Admin. for detection monitoring system		Closure plus 5 (TSR's) or Closure plus Post- Closure (Disposal facilities)		
Written demonstration notification		Closure plus 5 (TSR's) or Closure plus Post- Closure (Disposal facilities)		

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THE DOW CHEMICAL COMPANY

DO 006260

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b. Compliance Monitoring

[40 CFR 264.99]

Quarterly Compliance
Report/Compliance Period
(Concentration of hazardous
constituents in each
compliance point monitoring
well/s are meeting
groundwater protection
standard)

Annual determination of flow
and direction of groundwater

Notification of presence of
additional hazardous
constituents (App VIII) in
compliance point wells
(Annually)

Application for permit
modification to establish
corrective action program.

Written demonstration
notification

Closure plus 5 (TSR's) or
Closure plus Post
Closure
(Disposal facilities)

Closure plus 5 (TSR's) or
Closure plus Post
Closure
(Disposal facilities)

Closure plus 5 (TSR's) or
Closure plus Post
Closure

(Disposal facilities)

Closure plus 5 (TSR's) or
Closure plus Post
Closure
(Disposal facilities)

Closure plus 5 (TSR's) or
Closure plus Post
Closure
(Disposal facilities)

c. Corrective Action Monitoring

[40 CFR §264.100, .101]

Semi-annual report/on
effectiveness of corrective
action

Closure plus 5 (TSR's) or
Closure plus Post
Closure
(Disposal facilities)

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Written application for permit
modification (When program
no longer satisfies
requirements)

Closure plus 5 (TSR's)
or Closure plus Post
Closure
(Disposal facilities)

XIV. IN-PLANT ACCOUNTABILITY

A. Sewer Surveys (water survey)			DC
Permit-related surveys	L plus 1		
Special surveys	3		
B. Internal sewer permits	F plus 1		DC
C. Incineration/Landfill (Basis for recharge)	2		DR

XV. INTERNAL REPORTS

(Includes files on specific pollutants and
special studies, not filed in CRI)

A. Issue Management Team Minutes	3	#
B. Issue Management Team Policy Statements	Until superseded	DR
C. Technical Report Release Approvals	5	#

XVI. LANDFILL BURIAL RECORDS (ON- SITE DISPOSAL)

Land Disposal Certifications	See Section 861 XXIV	#
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XVII. MANUALS/DATA BOOKS

A. Emergency Response Manual	Until revised	
B. Standard Industrial Classification Directory (Codes for U.S.A. Operations)	Until revised	DCT
C. Environmental Services Data Books (See Analytical Records II)	50	DC

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XVIII. OFF-SITE AND ON-SITE DISPOSAL				
Landfill Burial Records (<i>on-site disposal</i>)		P		
Records for off-site disposal of hazardous and non-hazardous waste, including contracts, purchase orders, release invoices for purchase orders, manifests or any documents describing the amount, characteristics, methods and/or treatment of those wastes moved off-site (<i>both Dow owned and non-Dow owned</i>)		P	#	
Also see Section 861A XXIV(D.1)				
Landfill Tags (<i>Dow Owned Facility</i>)		P		
XIX. POLLUTION CONTROL BOND RECORDS		See Section 1551	DR	
XX. PROCESS AUTHORIZATION REVIEWS		5	DC	
XXI. QUARTERLY ENVIRONMENTAL SEC DISCLOSURE (<i>Background Data</i>)		2	DR	
XXII. RADIATION RECORDS (<i>other than "mixed waste" records under RCRA</i>)		See Section 1502F	#	
XXIII. REQUIREMENTS RECORDS				
A. 1. Comments to Federal Register Notices Statements before Congress or to the EPA		10 or until rule has been promulgated whichever is longer	NP	
2. EPA/Contractor Information Request Letters (§308/§114/§3007/§8(a))/SARA Title III and subsequent Dow correspondence) Original submission retained by E&HRA Data Center Backup data kept by Divisions		10 or until rule has been promulgated whichever is longer	NP	
B. Logs of informal agreements/ Communications with government agency personnel		10 or life of permit/equip., whichever is longer	DR	
C. Biennial Report (<i>See RCRA §2.1</i>)		15		

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D. Documentation of Our Legal Opinions/Interpretations Annual review to remove obsolete material

*Keep opinions as long as they are applicable.

E. Environmental Fines and Penalties (Statistical Data) 10

F. Environmental Incident Data (Monthly, Quarterly, Annual Reports) 5
(also see sections XXVI., A.1. and XXVI, B.3.)
Global Incident Reporting Database (GIRD)

G. Global Emissions Inventory (GEI) 12
GEI Database Records 12
Documentation of Changes made to database 12
Plant level worksheets, calculations 5
and activity data needed to support

XXIV. RESOURCE CONSERVATION AND RECOVERY ACT

Note: Records retained in order to comply with RCRA and regulations promulgated thereunder must be reviewed at the purge date to determine whether they must be relabeled and retained to comply with CERCLA or internal Dow policy (on-site or off-site disposal records.)

A. RCRA Permits/Applications /Modifications

1. RCRA Part A (including all external correspondence & computer files) L plus 5

2. RCRA Part B (including all external correspondence & computer files) L plus 5

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- | | |
|---|--|
| - Trial Burn Results | Until superseded |
| 3. State Permit Applications
(including all external
correspondence & computer files) | L plus 5 |
| 4. RCRA Permits | L plus 5 |
| 5. State Permits/Notice of
Registration | L plus 5 |
| 6. Consent Agreements,
Compliance Orders, Regulatory
Agreements | For duration of effect on
Dow |
| 7. Facility's RCRA Permit Reference
File (Candidates for this file are
A1-6) | Annual review to keep
current. Have division
RCRA Reg. Mgr. sign
and date yearly. |
- B. Generator Records
- | | |
|---|-------------------------|
| 1. Manifests | 3 |
| [40 CFR §262.40] | |
| <i>(These manifests become Off-Site/On-Site with permanent retention after 4 yrs under RCRA.) (See XVIII)</i> | |
| 2. Quarterly exception reports | 5 |
| [40 CFR, §262.40(b)] | |
| 3. Summary reports to State | 3 or as required by law |
| 4. Biennial reports to EPA | 3 |
| [40 CFR §262.40] | |

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	18
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

5. Training Records

Current Employees
Former Employees

Closure
3 after termination

6. Inspection Records

3

7. Identification number

P

[40 CFR §262.12]

8. Hazardous waste export notices

Expiration plus 3

9. Waste analysis reports (may be candidates for Superfund records/See Superfund/A)

3

[40 CFR §262.11, §262.50]

10. Storage/Hazardous Waste

3

A generator who accumulates
waste on-site for over 90 days
must also comply with
requirements for storage facilities
under 265 or 264 [40 CFR
§262.34]

11. Land Disposal Restrictions Certifications

5

[40 CFR §268.8(a)]

C. Transporter Records

1. Manifest

3

[40 CFR §263.22]

2. Discharge notice

3

[40 CFR §263.30]

3. State permit applications

L plus 3

4. State transporter permits

L plus 3

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THE DOW CHEMICAL COMPANY

DO 006266

DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	19
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

5. Identification number

P

[40 CFR §263.11]

Note: A transporter who stores manifested waste at a transfer facility for more than 10 days must also comply with 265 or 264 [40 CFR §263.12]

D. Operator Records

1. Landfills and Surface Impoundments

[40 CFR §264.73, §264.74, §265.73]

Closure plus

Post-Closure or as specified in Correction Action Program

a. Description & quantities of hazardous waste received by the facility

[40 CFR §264.73(b)(1), §265.73(b)(1)]

Closure plus Post-Closure or as specified in Corrective Action Program

b. Methods and dates of treatment, storage or disposal at the facility

[40 CFR §264.73(b)(1), §265.73(b)(1)]

Closure plus Post-Closure or as specified in Correction Action Program

c. Location of each hazardous waste within the facility & quantity at each location including maps and cell diagrams

[42 USC §9603; 40 CFR §264.73(b)(2), §265.73(b)(2)]

Closure plus Post-Closure or as specified in Corrective Action Program

*Note: 1a,b,c are candidates for permanent retention as per XVI

d. Land Disposal Restrictions Certifications

5

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DOW RECORDS RETENTION SCHEDULE

SECTION NUMBER		861A	PAGE	20
MAJOR FUNCTION		DATE		
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DECEMBER 1997		
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION

2. All Treatment, Storage and Disposal Facilities (including Landfills)

a. General Facility Description and Information (Keep track of TSD facilities)

Closure

b. Inspection records (mixed waste)

3

If waste contains radioactive materials

See Section 1502F

[40 CFR §264.15, .73(b)(5), §265.15, .73(b)(5)]

[10 CFR 20.2102a.2]

c. Waste analysis records (waste analysis, waste characterization, etc.)

Closure¹

[40 CFR §264.13, §265.13]

d. Groundwater records (monitoring, hydrogeologic studies)

P

[40 CFR §264.73(b)(5), §265.73(b)(60, .94)]

e. Training records

Current Employees
Former Employees

Closure
3 after termination

[40 CFR §264.16]

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	21
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

f. Preparedness and Prevention Plan		Closure ¹			
[40 CFR §264 Subpart C, §265 Subpart C]					
g. Contingency Plan		Closure ¹			
[40 CFR §264 Subpart D, §265 Subpart D] (updated annually)					
h. Emergency incident reports		Closure ¹			
i. Integrity assessments (new and existing hazardous waste tanks and associated lines)		P			
j. Biennial Report to EPA After 5 years move to XXIII REG. DEV. (for additional 10 years)		5			
[40 CFR §264.75, §265.75]					
k. Closure Plan		Closure plus 30/or until superseded			
[40 CFR §264.112]					
l. Post-closure plans and reports (including post-closure monitoring records)		Closure plus Post-Closure Until no longer relevant			
[40 CFR §264.117(a)(l), §264.118(c), §265.117(a)(l), §265.118(b)]					
m. Hazardous Waste Storage		Closure ¹			
[40 CFR 264.73(b)(1)]					

¹These RCRA records are candidates for permanent retention under Section XVIII or VII, E after their useful RCRA retention.

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	22
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

n. Summary reports to State		15			
o. Records for material sent to reclaimer or recycler		P			
p. Corrective Action/Compliance Plan Correspondence, Corrective Action order, Compliance plan, Analytical data (<i>Candidate for Permit Reference File XXV, A, 7.</i>)		For duration of effect on Dow ¹			
E. Annual Fee/s		2			
F. Financial Assurance (<i>Financial responsibility closure/post- closure and sudden and non-sudden accidental occurrences.</i>)		Current plus 1			
Forms		3			
Data		5			
[40 CFR Subpart H of 264 and 265]					
G. Notification of Underground Storage Tanks (<i>5/8/86 Regulated substances 101(14) CERCLA and petroleum</i>)		P			
[40 CFR §280.1-.3]					
H. Boilers and Industrial Furnaces Operating Records (<i>permitted units</i>)		until closure			
[40 CFR §266.102(e)(10)]					
Operating Records (<i>interim status units</i>)		until closure			
[40 CFR §266.103(k)]					

¹These RCRA records are candidates for permanent retention under Section XVIII or VII, E after their useful RCRA retention.

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THE DOW CHEMICAL COMPANY

DO 006270

DOW RECORDS RETENTION SCHEDULE

SECTION NUMBER		861A	PAGE	23
MAJOR FUNCTION		DATE		
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DECEMBER 1997		
Preferred Storage	Media	CURRENT YEAR PLUS TOTAL	OWNING	
RECORD NAME		RETENTION IN YEARS	CODE	SECTION

Inspections of Direct Transfer Operations

3

[40 CFR §266.111(e)(3)(iii)]

Residue Management

until closure

[40 CFR §112(c)]

Small Quantity Burner Exemption

3

XXV. SAFE DRINKING WATER ACT

A. Potable Water Records

5

NP

1. Well logs

P

DR

2. Plug and Abandon Report

P

DR

B. Deep Well Injection

(Underground Injection Control)

1. Permits

P

NP

2. Performance and Mechanical

P

DR

3. Integrity Records

P

DR

4. Gas Well Records

3

NP

5. Reports of Spills

10

NP

6. Baseline Surveys/Impact Studies

20

DR

7. Plug and Abandon Report

P

DR

8. Well logs

P

DR

XXVI. SUPERFUND

A. Comprehensive Environmental Response Compensation, and Liability Act (CERCLA)

1. Reporting to National Response Center

5

NP

[CERCLA §103, 40 CFR 302]

2. Notification of inactive hazardous waste storage, treatment or disposal sites

50

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THE DOW CHEMICAL COMPANY

DO 006271

DOW RECORDS RETENTION SCHEDULE

SECTION NUMBER		861A	PAGE	24
MAJOR FUNCTION		DATE		
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DECEMBER 1997		
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION

- | | |
|--|---------------------------|
| Records specifying location,
title or condition of such sites | 50 |
| [CERCLA §103(c)] | |
| Request from EPA for
information/old site | 50 |
| [CERCLA §104(e)] | |
| 3. Records specifying the identity,
characteristics, quantity, origin or
condition (<i>including
containerization and previous
treatment</i>) of hazardous waste
contained or deposited in such
sites. (<i>Dow Policy, see Section
XVIII.</i>) | 50 |
| [40 CFR §103(d)(a)(A)] | |
| 4. Records and documents
pertaining to the performance of
abatement action pursuant to
§106(a), [42 USC §9606(a)], of
CERCLA not covered under
other portions of this schedule
(<i>e.g., RI/FS, work plans,
administrative orders and
associated data and reports,
PSAD, ROD, RD, RA.</i>) | As specified in the order |
| (<i>Includes groundwater monitoring
records.</i>) | 50 |
| 5. Petition for delisting the site from
NP List Final Summation | 50 |

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THE DOW CHEMICAL COMPANY

DO 006272

DOW RECORDS RETENTION SCHEDULE

SECTION NUMBER		861A	PAGE	25
MAJOR FUNCTION		DATE		
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DECEMBER 1997		
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	OWNING CODE	SECTION

B. Superfund Amendments Reauthorization Act (SARA)

Emergency Planning and Community Right to Know Act (*Title III*)

- | | | |
|---|----|---|
| 1. Emergency Planning Notification
[§302 of Act] | 5 | |
| 2. Notification of Identity of Facility
Representative

[§303 of Act] | 5 | |
| 3. Emergency Release Notification
(Both LEPC and SERC)

[§304 of Act] | 5 | |
| 4. Categorized List of OSHA
"Extremely Hazardous
Substances or Material Safety
Data Sheets

[§311 of Act] | 5 | |
| 5. Emergency and Hazardous
Chemical Inventory and Location
Form

[§312 of the Act] | 5 | |
| 6. Toxic Chemical Release
Inventory Reporting Form R
(Including all individual plant
activity data to support this
annual facility report starting in
1993 with 1987 data)

[40 CFR §372.10/§313 of Act] | 5* | * Exception - All 1988
baseline data should be
kept until the year 2000 |

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THE DOW CHEMICAL COMPANY

DO 006273

DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	26
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

7. Trade Secret Substantiation
Claims/ Chemical Identity for
§303(d)(2) and §303(d)(3), §311,
§312, §313

3 after we waive our
claim or claim is finally
denied

[40 CFR 350]

XXVII. TOXIC SUBSTANCE CONTROL ACT

*(For health issues under TSCA - See
Section 861B)*

A. Section 6 Polychlorinated Biphenyls (PCB's and PCB Items)

1. In-service or projected for
disposal Annual report/supporting
records

5¹

NP

[40 CFR §761.180(b)]

2. Disposal and Storage Facilities
(General Requirements)

Annual document/supporting
records

5³

NP

[40 CFR §761.180(b)]

Special records

5³

NP

[40 CFR §761.180(f)]

Inspection by State

7

¹Years after facility ceases to use or store.

²Years from date of collection of such
information.

³Years after facility ceases to store or dispose.

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	27
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

3. Incineration Facilities

Trial burn results	5 ³	DC
Permit application		

[40 CFR §761.180(b)]/[40 CFR §761.180(f)]

Annual document/supporting records	5 ³	NP
------------------------------------	----------------	----

[40 CFR §761.180(b)]

Special records	5 ²	NP
-----------------	----------------	----

[40 CFR §761.180(c)]

Inspection by State	7	
---------------------	---	--

4. Landfill Facilities

Annual document/supporting records	P	NP
------------------------------------	---	----

[40 CFR §761.180(b)]

Special records	P	NP
-----------------	---	----

[40 CFR §761.180(f)]

Operating records on water analysis/ burial coordinates	P	NP
---	---	----

[40 CFR §761.180(d)]

5. PCB Rule 3 Exclusion (Inadvertent Generation)

7¹

¹Years after facility ceases to use or store.

²Years from date of collection of such information.

³Years after facility ceases to store or dispose.

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THE DOW CHEMICAL COMPANY

DO 006275

DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	28
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS		CODE	OWNING SECTION

Supporting records (*includes
monitoring records and
theoretical analyses*) 7⁴

[40 CFR §761.3 and Subpart J])

6. PCB Transformer Inspection and Maintenance records 3¹

[40 CFR §761.30(a)]

B. Section 8A See Section 861B

C. Section 8B
Site or Plant Inventory lists Until superseded #

D. Pre-Manufacture Notifications (PMN's) See Section 861B

E. Section 8C See Section 861B

F. Section 8D See Section 861B

G. Section 8E See Section 861B

XXVIII. WASTE MINIMIZATION

Dow "WRAP" Program (*All supporting data*) 5

Hazardous Waste Generation Reports to Regulators

1. Annual State Reports 5

2. Federal Biennial Survey
Forms WM-Part I, II 5

3. Toxic Chemical Release
Inventory Reporting Form R
Section 8 (*This is part of a SARA
record 313 record*) 5

¹Years after facility ceases to use or store.

⁴Or three years after process ceases, whichever is shorter.

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THE DOW CHEMICAL COMPANY

DO 006276

DOW RECORDS RETENTION SCHEDULE

SECTION NUMBER		861A	PAGE	29
MAJOR FUNCTION		DATE		
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DECEMBER 1997		
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION

XXIX. CLEAN WATER ACT

A. Permits & Applications

- | | |
|---|---|
| 1. NPDES/State Permits, Applications, and associated correspondence | Life of current permit plus previous permit |
| 2. Storm Water General Permits Notice of Intent (NOIs) | Life of current permit plus previous permit |
| 3. Discharge Permits/Contract Licenses for Source Dumping Into POTW | Life of current permit plus previous permit |
| 4. Dredge and Fill Permits | Life of current permit plus previous permit |
| 5. Records of data used to complete applications | Life of current permit plus previous permit |
| [40 CFR §122.21(o) requires a minimum retention of 3 years] | |

B. Monitoring Reports

- | | |
|---|-----------------------|
| 1. Discharge Monitoring Reports (DMR), State Monitoring Reports, Analytical Reports & Raw Data Sheets (to support monitoring reports) | Life of permit plus 5 |
| [40 CFR §122.41(j)(a) requires a minimum retention of 3 years] | |
| 2. POTW Industrial User Monitoring Reports | Life of permit plus 5 |
| [40 CFR §403.12(o)(3) requires a minimum retention of 3 years] | |
| 3. Noncompliance Reports and associated correspondence to the Agency | Life of permit plus 5 |

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	30
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

C. Special Studies/Baseline Data As long as useful; after 10 requires written authorization

D. Storm Water Pollution Prevention Plans (SWPPPs)

- | | |
|---------------------------------------|-----------------------|
| 1. Annual site inspection | Life of permit plus 5 |
| 2. Annual site compliance evaluations | Life of permit plus 5 |
| 3. Certification of Compliance | Life of permit plus 5 |
| 4. Noncompliance Reporting | Life of permit plus 5 |
| 5. SWPPP Amendments/ Modifications | Life of permit plus 5 |

E. Best Management Practices (BMPs) Until superseded

[40 CFR §125]

F. Enforcement Actions (*see 861A, VIII*)

G. Permit Reference Files (*candidates for this file are all prior records for A through F*) Annual review to keep current. Have division CWA Regulatory Manager sign and date yearly

H. Fees 2

I. Daily logs from operations 3

J. CWA §311 Spills

- | | |
|--|---|
| 1. Spills (<i>reports to Agency</i>) | 5 |
| 2. Other non-superfund spill reports | 5 |

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861A	PAGE	31
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - ENVIRONMENTAL		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

K. Spill Prevention Control & Countermeasure (SPCC) [40 CFR §112]

- | | |
|----------------------------|------------------|
| 1. SPCC Plan | Until superseded |
| 2. SPCC Inspection Records | 3 |
| 3. SPCC Training Records | 3 |

L. Facility Response Plans [40 CFR §112.20]

Until superseded

While [40 CFR §112.41(j)(a)] and [40 CFR §403.12(o)(3)] require a minimum retention of 3 years, discharges may be subject to a citizen suit for 5 years in most jurisdictions.

CODE INDEX

- L = Life of Permit
- P = Permanent
- A = As specified in Permit
- F = Life of Facility

To ensure "evergreen status," this record retention schedule is subject to review at quarterly Environmental Managers meeting.

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	DATE	PAGE
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION

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THE DOW CHEMICAL COMPANY

DO 006280

DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861B	PAGE	1
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - HEALTH SCIENCES		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

I. General

Audits, Guidelines	Until revised
Audits, Reports	1
Audit working papers; notes; drafts of final report	Short term; maximum when final report is prepared
Follow-up responses to final report and related correspondence	File with final report; destroy with final report
Certificates of Compliance/Letters of Certification/Listings	2 after product is discontinued
Comments, Notices, & Reports to Regulatory Agencies, including back-up data (Submissions file)	15
FIFRA 6(a), TSCA 8(e) & TSCA 8(c) Committee (Dow) Minutes/Completed Special Projects/Communications	1
Continuing Guarantees by Dow on our Products	Duration of guarantee. Where there is no time limit in the guarantee, 1 after product is discontinued, but not more than 7.
Continuing Guarantees by suppliers on their Products	1 after purchase is discontinued
Data Necessary for Certification in Professional Organizations	7
Interpretation of Regulations	As long as useful
Lists of regulations, people, chemicals	As long as useful, max until superseded
Product Files:	
Correspondence	2
Projects	1 after completion
Raw Material/Additives - Supplier Information	Current

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THE DOW CHEMICAL COMPANY

DO 006281

DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861B	PAGE	2
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - HEALTH SCIENCES		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

Registrations (Other than FDA, USDA and FIFRA)

All other registrations except those listed below:

Antifreeze	3 after registration is canceled
Brake Fluid	7
Commercial Fertilizer	7

Training Materials (must be dated)

Until Revised

Voluntary submittals of information to government agencies (i.e. ATSDR, Agency for Toxic Substances Diseases Registry)

12

II. FDA/USDA/NSF and Other Groups

Certificates/Certification Listings

2*

National Sanitation Foundation
Union of Orthodox Jewish Congregations of America
Others

2*

2*

2*

FDA/USDA Files

Government Inspection Reports	1
Drug Master Files	20*
Notice of Termination of Product	20*
Drug Site Registration	1
Status Letters and Summaries	1*
Drug Listings	1*
Technical Backup to Support Classification (except for records that already have an established retention schedule)	1*

USDA Approval Letters	1*
Petitions for FDA/USDA Approval	5*

* After product is discontinued

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THE DOW CHEMICAL COMPANY

DO 006282

DOW RECORDS RETENTION SCHEDULE

SECTION NUMBER		861B	PAGE	3
MAJOR FUNCTION		DATE		
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - HEALTH SCIENCES		DECEMBER 1997		
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION

III. FEDERAL INSECTICIDE, FUNGICIDE AND RODENTICIDE ACT (FIFRA)

Federal FIFRA Registrations	8 after registration is canceled
All other registrations	3 after registration is canceled
Correspondence on Inactive Registration Submissions	5 after date of last entry in the file
Petitions for FIFRA Approval	5*
* After product is discontinued	

IV. OCCUPATIONAL SAFETY AND HEALTH ACT (OSHA)

Records of Inspections, Citations and Resolutions of Citations by Government Agencies	15 or until superseded
Records of visits by OSHA (Occupational Safety & Health Act) and/or NIOSH (National Institute for Occupational Safety and Health) personnel	3
Submissions of survey information to OSHA and/or NIOSH	10 or until rule has been promulgated whichever is longer
Records of health hazard evaluations by OSHA and/or NIOSH	20
Other data submissions to NIOSH	10 or until rule has been promulgated whichever is longer

V. TOXIC SUBSTANCES CONTROL ACT (TSCA)

TSCA (Toxic Substances Control Act) Correspondence NOC (Not otherwise classified)	4
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THE DOW CHEMICAL COMPANY

DO 006283

DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861B	PAGE	4
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - HEALTH SCIENCES		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

VI. TSCA Section 4 Test Rules

Notice of Intent to sponsor testing	6*
Request for exemption	6*
Notices for exemption on Dow's behalf	6*
Test study plan and related correspondence	6*
Study reports - Dow sponsored	75 - See Tox Studies, Section 1502D
Study reports - non-Dow sponsored	6*
Consent Agreements to Test	6*
Contracts to Conduct Testing under Section 4	6*
* after submission of last test data	

VII. TSCA Section 5 Premanufacture Notification (PMN), Commercialized

PMN document	15 after submission of COM (See below)	
PMN Backup information	5 after date of COM (See below)	
Notice of Commencement of Manufacture (COM) and backup	15	
Records of production volume for 3 yrs from date of COM	5 after date of COM	
Section 5(e) Order Compliance Information	5 unless otherwise specified in the order	
Section 5(e) Consent Orders and/or Compliance Agreements	Duration of effect on Dow plus 5	
Significant New Use Rule (SNUR) Information (SNURS on non-Dow PMNs)	5 unless otherwise specified in the Rule	
SNUR Information on Dow PMNs for sections formally part of a 5(e) Order	5 unless otherwise specified in the Rule	CONFIDENTIAL

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DOW RECORDS RETENTION SCHEDULE

SECTION NUMBER		861B	PAGE	5
MAJOR FUNCTION		DATE		
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - HEALTH SCIENCES		DECEMBER 1997		
Preferred Storage	Media	CURRENT YEAR PLUS TOTAL	OWNING	
RECORD NAME		RETENTION IN YEARS	CODE	SECTION

VIII. TSCA Section 5 Premanufacture Notification (PMN), Not Commercialized

PMN document and all related correspondence in the PMN file	As long as useful
Documentation of amount made, used, distributed, disposed of, & inventoried	5
Technical Qualifications of R&D Supervisors	5
Notifications of Risk, including backup and information reviewed to evaluate potential risk to health & environment	30

IX. TSCA Section 6 PCB Regulations (See Section 861A XXVII)

X. TSCA Section 8(a) CAIR/PAIR Reports

PAIR (Preliminary Assessment Information Rule) (Submissions file)	5
CAIR (Comprehensive Assessment Information Rule) (Submissions file)	5
Backup (PAIR/CAIR) - Correspondence and Surveys	5
Inventory Update Report to EPA	5
Inventory Update Reports backup information in the Submissions file	5
Less than 10,000 lbs produced - documentation	5
Computer database (5 data sets)	5
Documents to Support Potential Inventory Corrections 8(b)	Until accepted by EPA and listed on the Inventory

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DOW RECORDS RETENTION SCHEDULE

SECTION NUMBER		861B	PAGE	6
MAJOR FUNCTION		DATE		
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - HEALTH SCIENCES		DECEMBER 1997		
Preferred Storage	Media	CURRENT YEAR PLUS TOTAL	OWNING	
RECORD NAME		RETENTION IN YEARS	CODE	SECTION

XI. TSCA Section 8(c) Report of Adverse Reaction File

Report of Significant Adverse Reaction, Occupational, recordable	30
Report of Adverse Reaction, Other, recordable	5
Reports from Computer Log	Short Term
Report of Adverse Reaction, Not Recordable	Short Term
Disposition Letter	As long as useful, Max 1
Review Committee Minutes	As long as useful, Max 1

XII. TSCA Section 8(c) Report of Adverse Reaction Log

Computer entries for filed reports, Employee Health	30
Computer entries for filed reports, Other	5
Computer entries for reports not filed	1
Indexes	Short Term
Statistical Reports	Short Term

XIII. TSCA Section 8(d) Health and Safety Studies

Copies of studies submitted (Submissions file)	5
Lists of studies submitted (Submissions file)	15
Correspondence with EPA (Submissions file)	10

XIV. TSCA Section 8(e) Substantial Risk Notices

Notices to EPA (Submissions file)	5
Committee minutes	10

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	861B	PAGE	7
ENVIRONMENTAL AND HEALTH REGULATORY AFFAIRS - HEALTH SCIENCES		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS		CODE	OWNING SECTION

Committee Charter/Procedures/Guide

Until Superseded

XV. TSCA Section 12(b) Export Notices

Notices to EPA (Submissions file)

10

Computer log

Until Superseded

XVI. TSCA Section 13 Import Certification

Copies of letters certifying TSCA status

5

Compliance Certification letters

5 (kept by originator)

XVII. Dow TSCA Publications

TSCA Handbook, Brochures, Manuals and
other guidance documents

Until Superseded

TSCA Newsletter (Questions and guidance
documents)

1

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	DATE	PAGE
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION

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THE DOW CHEMICAL COMPANY

DO 006288

DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	901	PAGE	1
EXECUTIVE		DATE DECEMBER 1997			
RECORD NAME	Preferred Storage Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

KEY CORP/BOSTON EQUISERVE LIMITED PARTNERSHIP

Canceled Stock Certificates	6		DR	
Stock Transfer Journals	5 after corporation is dissolved		DR	
Stockholders' Meetings:				
Voted Proxies	2		DR	
Workpapers, Ballots, etc. from annual meeting	6		DR	
Shareholders of Record - Microfiche	3		DR	

MINUTES:

Corporate Board of Director Meeting Minutes	VITAL RECORD Dispose of five years after dissolution of the company	DC	
Corporate Executive Committee Minutes	VITAL RECORD Dispose of five years after dissolution of the company	DC	
Audit Committee Minutes	40	DC	
Compensation Committee Minutes	40	DC	
Contributions Committee Minutes	5	DC	
Environment, Health and Safety Committee Minutes	5	DC	
Finance Committee Minutes	5	DC	
Investment Policy Committee Minutes	Life of the IPC or any committee succeeding its function + 6	DC	
Public Interest Committee Minutes	5	DC	

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	DATE	PAGE
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	905	PAGE	1
CORPORATE AVIATION		DATE DECEMBER 1997			
RECORD NAME	Preferred Storage Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	
<u>Accounting</u>					
Cost Sheets		5		DC	
Invoices - Construction		Life of equipment or property + 4		DC	
Invoices - Purchased Fuel Away				DC	
Domestic		1			
International		3			
Maintenance Supplies and Aircraft Parts		4		DC	
Invoice Copy					
Packing Lists					
Purchase Orders					
Quotations					
Release Forms					
<u>Administrative</u>					
Pilot Duties and Flight Times		4		DC	
Policy Letters		Current copy		DR	
<u>Capital Projects</u>					
Active Capital Projects		See Sections 825, 841, 1441		DC	
Authorization Packages		See Section 501		DC	
Capital Spending Projections		2		DC	
Specifications		Life of equipment + 4		DR	
<u>Commercial Travel</u>					
Flight Itinerary - Work Copy		6 months			
Invoice Itinerary		4			
Inplant Records		4			
Refunds		1			
Client Profile		Current			

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	905	PAGE	2
CORPORATE AVIATION		DATE		DECEMBER 1997	
RECORD NAME	Preferred Storage Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS		OWNING CODE	SECTION

Dow Flights and Car Rental

Aircraft Charter Contracts; Expired (Purchasing)	4	DC
Schedule Sheets - Dow Form #48010	5	DC
Car Rental Authorized Rep Cards	Life of card + 1	NP
Car Rental Company Travel Orders	1	NP
Car Rental Contracts; Expired (Purchasing)	4	DC
Rebiling	1	DC
Aircraft Recharge - Ledger Summary		
Flight Record		

Equipment, Operations

Aircraft Maintenance Records	As required by FAA regulations	DC
Flight Sheets	4	DC
General Flight Information, Master Copy Form and Computer Tape and Discs	4	DC

Fuel Farm, Home Fuel

Daily Usage Form	1
Fuel Flowage-airport	1
Fuel Inventory Report	1
Invoice Copy	1
Physical Inventory Form	1

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DOW RECORDS RETENTION SCHEDULE

MAJOR FUNCTION		SECTION NUMBER	907	PAGE	1
EXECUTIVE - DOW CLUB/CUSTOMER ACCOMMODATIONS CENTER		DATE DECEMBER 1997			
Preferred Storage RECORD NAME	Media	CURRENT YEAR PLUS TOTAL RETENTION IN YEARS	CODE	OWNING SECTION	

Dow Club

Charges to Club Users (Department's File Copy)
Originals to Accounts Payable 2 DC

Customer Visit History 5

Reservations, Functions and Rooms Schedule 5 DC

Special Menu File Current copy DC

WINE Quantity Records 2

Customer Accommodation Center

Accounting Rebill Spread Sheet 10

Daily Occupancy Book 2

Daily Operations Report 5

Lease Information 4 after termination of
lease

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