



DOW PIPELINE COMPANY

July 27, 1990

Melissa Blue, B-101
Cynthia Hindman, B-101

cc: Tom Butz, Dow Center
Dick Olsen, 1803 Bldg, Midland
Richard Smith, IPO

ADDITIONAL REFINEMENT OF DOCUMENTATION LETTER DATED 7/5/90

Suggestions by Melissa Blue and Cynthia Hindman of the Industrial Hygiene Department revealed a need to add to and further explain certain points of documentation in the original letter.

Please disregard the original letter and replace it with this one which contains better descriptions of documentation and our intent.

Thanks.

A handwritten signature in cursive script that reads "Carl Amos".

Carl Amos
Environmental Specialist
DPL/SDO/ES

mhi
attachment

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DOW PIPELINE COMPANY

July 27, 1990

Melissa Blue - B101
Cynthia Hindman - B101

cc: Tom Butz, Houston Dow Center
Dick Olsen, 1803 Bldg., Midland
Richard Smith, IPO

SUBJECT: DOCUMENTATION OF APPLICABLE REGULATIONS AND PROBLEMS OF PIPELINE
COATING REMOVAL DURING UPGRADE PROJECTS PER THE RECOMMENDATION OF
MR. DICK OLSEN.

Following the recommendations of Dick Olsen and pursuant to 40CFR 61.141,
40CFR 1926.58 and 40CFR 1910.12, we submit the following documentation:

1. We feel the 40CFR 61.141 definition of friability does not meet the criteria of our somastic pipeline coating.
2. Per the definition of "action level" defined in 40 CFR 1926.58, we feel that the personnel monitoring done exceeds the lower limit of this definition. Attached are analytical results of our monitoring. Please note that polarized light microscopy was used instead of the more accurate transmission electron microscopy which typically yields lower fiber counts.
3. At pre-job safety meetings, we intend to follow the requirements of 40CFR 1910.12 to fully educate the personnel working on the pipeline.
4. In a case in litigation found in the legal opinion written by Jerry Smith, provisions were made to exclude negative pressure enclosures if (1) a hazard is created and (2) the impossibility of negative pressure enclosures exists.

Our justification for not wearing PPE is included separately and this documentation was again a recommendation of Mr. Olsen.

Sincerely,

Carl Amos
Dow Pipeline/SDO/ES

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Melissa Blue, B-101
Cynthia Hindman, B-101

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Richard Smith, Dow Center
Dick Olsen, Midland

JUSTIFICATION FOR PROCEDURES USED DURING REMOVAL OF SOMASTIC PIPE COATING

The following items justify not using negative pressure enclosures, HEPA respirators and impermeable clothing.

1. Monitoring results were very low (approaching the EPA definition of clean air at .01f/cc). Actual monitoring results follow the justification items.
2. The monitoring results were probably worst case. Typically, periodic removal of coating in the field would be dictated for job efficiency. Our monitoring was done on a worker assigned the sole task of removing coating for data gathering. PPE requirements of this individual included HEPA half-face mask, impermeable clothing and eye protection.
3. An aggressive monitoring program is planned for any additional work involving ACM pipe coating.
4. Work is done outdoors, typically in remote areas.
5. Non-availability of any utilities. (Our right of ways go through areas with no access to water, electricity, natural gas, etc.)
6. The heat stress potential. (On our right of ways, there are no cool places to go if overheated in impermeable clothing.)
7. Impossibility of retrieval of all coating chips. (Some trenches are under water at all times. At other times, the coating is left in the original trench.)
8. Personnel safety is compromised if attempts are made to retrieve the coating chips mentioned in Item 7.
9. Non-friability characteristic of the pipe coating becomes even more so during summer months when the heat makes the coating more pliable and a more effective binder.
10. Inaccessibility of work stations. (Mud, water, landscape, etc. Special equipment sometimes has to be employed to reach the work stations.)
11. Moving workstation. (Sometimes the workstation may be in excess of five miles in length. Sloping or shoring the trench for this distance is highly impractical to ensure worker safety when removing all coating from the trenches. In practice, sloping actually covers up coating that it is designed to remove.

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Analyses performed by a Certified Industrial Hygienist follow:

<u>Sample Description</u>	<u>Asbestos Results</u>
MM 143, Hwy 1442	Positive, ~3% chrysotile
Hwy 190, Orange, TX	Positive, ~3% chrysotile
MM 140, Hunting Club	Positive, ~3% chrysotile
East of Bob Hall Rd.	Positive, ~3% chrysotile
Caribou Lane	Positive, ~3% chrysotile
Cow Bayou	Positive, ~3% chrysotile

The above are results of the actual coating.

<u>Sample Number</u>	<u>Volume (liters)</u>	<u>Fiber Count f/cc</u>
CA-1 ("STEL")	72	0.007
CA-2 ("TWA")	634	0.014

Again, the above analytical results are from worst case air monitoring.

Hopefully, this will suffice as justification for our coating removal procedure and documentation of such to satisfy the request of Mr. Olsen.

Sincerely,



Carl Amos
Environmental Specialist
DPL/SDO/ES

mhi

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