DOW CHEMICAL U.S.A.

PLAINTIFF'S EXHIBIT

DOW-1731

MIDLAND, MICHIGAN 48667

MICHIGAN DIVISION
August 17, 1990

J. LaBean, 572
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cc: D. Martin, 258
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RE: INTERIM REPORT ON REMOVAL OF NON-FRIABLE ASBESTOS GASKETS

On July 31, 1990 a simulation was conducted of the removal of non-friable asbestos gaskets. During this simulation, air sampling was conducted to evaluate employee's potential exposure to asbestos during the gasket removal and only gaskets that could be removed without scraping the material from the flange were studied. The results can be found in the attached tables.

The results indicated that non-friable gasket material may be removed without exceeding current asbestos exposure guidelines. It should be noted however, that gasket materials have shown the potential for exposure above the current guidelines when scraped from flanges rather than being removed in-whole.

It is recommended that only qualified individuals remove friable asbestos gaskets (per 29CFR1926.58) which adhere to flanges. Gasket materials which do not adhere to flanges may be removed by other personnel.

Please contact me should you have any questions.

Mike

Mike Dupuis
Industrial Hygiene Services
258 Building
Phone: 6-5864

Attachment

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TABLE 1. EVALUATION OF POTENTIAL[1] EXPOSURES TO ASBESTOS DURING ASBESTOS GASKET REMOVAL, MICHIGAN DIVISION CRAFT SERVICES, 500 BUILDING, JULY 31, 1990.

HEH2.1-1-180(4)

Date	Master Number	Time (min.)	Number Of Gaskets Removed	Asbestos Concentration (f/cc)[2] Excursion	8hr TWA[3]
7/31/90	054960	175	13	0.07	0.03
7/31/90	065389	163	13	0.03	0.01
7/31/90	061761	70	2	0.05	<0.01
7/31/90	063366	70	2	0.12	0.02
PEL[4]				1.0	0.2

1. Potential - Respiratory Protection Used
2. f/cc - Fibers per cubic centimeter
3. 8hr TWA - Excursion exposure converted to 8hr time-weighted average.
4. PEL - OSHA Permissible Exposure Limit

TABLE 2. EVALUATION OF POTENTIAL[1] SHORT-TERM EXCURSION EXPOSURES TO ASBESTOS DURING ASBESTOS GASKET REMOVAL, MICHIGAN DIVISION CRAFT SERVICES, 500 BUILDING, JULY 31, 1990. HEH2.1-1-180(4)

Date	Master Number	Time (min.)	Floor	Number Of Gaskets Removed	Asbestos Concentration f/cc [2]
7/31/90	063366	28	1	2	0.01
	061761	28	1	2	0.01
	065389	2	1	1	0.09
	054960	3	1	2	0.01
1st Floor Background Sample		89	1	NA[3]	0.02
7/31/90	065389	21	2	6	0.01
	065389 (Unbolting Flange Only, Gasket Not Removed)	16	2	0	<0.01
	054960	20	2	4	0.03
2nd Floor Background Sample		82	2	NA	0.02
STEL[4]					1.0

1. Potential - Respiratory Protection Used
2. f/cc - Fibers per cubic centimeter
3. NA - Not Applicable
4. STEL - OSHA Short-Term Exposure Limit

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