



DOW CHEMICAL U.S.A.

PITTSBURG, CA
October 27, 1987

Don Kruelski
Building 801
Louisiana Division

cc: Joe Althouse, 2,3 Penta
Scott Anderson, Environmental
Dale Backlund, Spec. Chem.
Kurt Detrick, Midland
Randy Fischback, Starane
Janice Gatlin, Research
John Gray, Midland
Paul Hannan, Environmental

Jim Keith, Midland
Jerry Kovacich, Verdict Trifluoro
Bill Ledford, Louisiana Division
Mike Nevill, Louisiana Division
Jim St. Onge, Sym-Tet
Helen Tobol, Industrial Hygiene
Mark Van Dort, Research

RE: REMOTE TSCA 5(E) REGULATED CHEMICAL DISPOSAL

The attached information is intended to provide you the necessary documentation to instruct your employees and contractors as to the potential hazards associated with handling the TSCA 5(E) regulated materials shipped to you from Western Division for disposal by incineration. We ship waste to you in bulk quantities and in green plastic drums labelled PMN Type 172. These procedures apply to both disposal operations. I am still developing this indoctrination package, therefore, we can expect modifications as we proceed to use this system.

It is important that each person having potential for exposure to these compounds be fully indoctrinated. I stress that this information needs to be communicated in a formal safety meeting. The warning statements must be presented both orally and in written form. Each person indoctrinated is required to sign the attendance form, a copy of which has to be kept in your local files for a minimum period of 5 years. A copy should also be forwarded to me. Some of the TSCA 5(E) orders require we give a copy of the warning statement and a list of the required protective equipment to each individual indoctrinated. To simplify matters, I am requesting all of the written warnings be given to your workers. In addition, I have chosen the most stringent protective gear list as the official gear to wear during cleanup of leaks and spills. If any spill occurs in a poorly ventilated area, vapor emissions must be captured and vented away from the work area. Our drummed materials have been solidified leaving little opportunity for vapors to exist, however, you may need to give special attention to the bulk shipments.

The "Tracking" document with which you are already familiar still needs to be completed and returned to us at Western. You are further required to keep written records containing at minimum the following:

AN OPERATING UNIT OF THE DOW CHEMICAL COMPANY
RESTRICTED FOR USE WITHIN THE DOW CHEMICAL COMPANY

**Quality
Performance**
Means More At Dow

DO 073725
CONFIDENTIAL

1. The names of persons indoctrinated, the means by which they were informed, the accompanying dates and information provided.
2. The dates and descriptions of leaks and spills involving the 5(E) regulated materials including the names and dates of persons directly involved in cleanup.
3. Any names used to identify these regulated materials and the accompanying dates of use (since you will likely handle mixtures of these substances, I strongly suggest you simply refer to them generically as "PMN Chemicals")

These indoctrination procedures, if strictly adhered to, will substantially meet these requirements. You should be aware that some of the information in this indoctrination package is considered Dow Confidential Business Information and should be treated as such, especially where contractors or other non-Dow workers may be involved. You should make sure that any non-Dow workers have current secrecy agreements with Dow. Please note these records are subject to inspection by both Dow and the EPA.

You should immediately begin indoctrinating your workers having potential for exposure to these materials. If you have any questions or suggestions, please direct them to me. My telephone number is (415) 432-5650.

Ollie Cotton

Ollie Cotton
Western Division TSCA Coordinator

/eo

Attachment

INSTRUCTION

1. Present orally and visually all information contained on the overhead slides.
2. Discuss as much of the data on the T.I.M.E. sheets as you feel necessary to properly convey a clear understanding of the nature of these chemicals.
3. Provide each person indoctrinated with a written copy of the Protective Gear and EPA warning statements. (I included several of each for your use.)
4. Be sure all sign the safety meeting attendance record, keep a copy in your files and send a copy to me.

NOTE: Transparencies provided only for those actively involved in providing indoctrination.

Western Division

TSCA 5 (e) Regulated Compound Disposal

Remote Indoctrination

Western Division manufactures several compounds that are regulated under the Toxic Substances Control Act, many of these have very specific operating conditions expressed as mandates in 5 (e) Enforcement Orders. In a general way, these orders require that training and indoctrination be provided all persons who have potential to be exposed to these materials. Those of you who are involved in the disposal of waste materials containing these substances may have potential for exposure in the event of a leak or spill, in which case, the clean up procedures expressed in the specific orders must be initiated and the workers involved must have been warned as to the perceived health concerns related to these 5 (e) regulated chemicals. In addition there are very specific wearing apparel and breathing apparatus which must be donned to effect any clean up of leaks and spills associated with these TSCA 5 (e) regulated materials.

DO 073728
CONFIDENTIAL

WESTERN DIVISION

TSCA 5 (e) Regulated Chemicals:

PMN 83-237 - 2,3-dichloro-5-trifluoromethyl pyridine

PMN 83-1162 - 2,6-dichloro-3-trichloromethyl pyridine

PMN 83-1163 - 2,3,6-trichloropyridine

PMN 84-1219 - 2,3-difluoro-5-trifluoromethyl pyridine

PMN 85-236 - 3-chloro-2-fluoro-5-trifluoromethyl pyridine

PMN 85-36 - 2,3-dichloro-5-chlorodifluoromethyl pyridine

PMN 85-706 - 2,3,6-trichloro-5-trichloromethyl pyridine

PMN 86-838 - 4-amino-3,5-dichloro-2,6-difluoro pyridine

PMN 85-535 - 2,3,5-trichloro-4,6-difluoro pyridine

PMN 85-536 - 3,4,5-trichloro-2,6-difluoro pyridine

PMN 85-216 - 3,5-dichloro-2,4,6-trifluoro pyridine

The EPA has concerns that exposure to these materials may cause health problems leading to cancer, or damage to the liver, kidney or central nervous system. In view of this, you are required to successfully complete a respirator fit test and keep documentation.

For clean up, you are required to wear:

- 1) organic vapor respirator cartridge
- 2) impervious suit
- 3) impervious gloves
- 4) impervious boots
- 5) face shield; and
- 6) chemical goggles (or equivalent eye protection as part of a respirator or face shield).

Any protective equipment designated "impervious" has been determined by the Company to be impervious to the PMN substance under the conditions of exposure, including the duration of exposure. The Company has made this determination either by direct testing, evaluating the specifications supplied by the manufacturer of the protective equipment, or by evaluating data from equipment tested with structurally analogous substances. Testing or evaluation of specifications included consideration of permeability, penetration, and potential chemical and mechanical degradation by the PMN substance and associated chemical substances.