



DOW CHEMICAL U.S.A.

PLAINTIFF'S EXHIBIT

DOW-1350

MICHIGAN DIVISION
May 12, 1987

MIDLAND MICHIGAN 48667

W. E. Ledford
3502 Building
Louisiana Division

cc: R. Peebles, LA Division

AUDIT; CELL SERVICES, 5601 BUILDING

General Comments:

Plant meets or exceeds specific requirement in the Construction Industry Standard for Asbestos, CFR 1926.58. Overall housekeeping, storage and handling of asbestos is excellent. Application of control methods to reduce asbestos exposure is excellent. Records, training, monitoring studies is excellent. Contractor employees and plant management have obviously expended considerable effort and energy to ensure that the policies and procedures implemented to control airborne asbestos fibers are enforced.

Specifics:

Plant documentation of training programs with specific subjects noted, including instructor names and attendees indicate appropriate legal documentation.

Monitoring studies, number of samples taken, sampling procedures, documentation meets or exceeds regulatory requirements.

Housekeeping, use of water, control devices such as boot washers and high efficiency vacuum cleaners, respiratory protection, and protective clothing are excellent.

Recommendations:

1. In order to ensure that all personnel are aware of contents of containers and tanks containing asbestos, as a slurry or solid, such containers and tasks should be labeled as per CFR1926.58(k)(2)(iii).
2. Although the work floor of the plant is not a regulated area, i.e., levels of asbestos <0.2 fibers/cc, the use of water jugs and cups at various work stations in the plant is not consistent with the good control practices followed by personnel in the plant. Since this practice is of questionable value and open for criticism, it is suggested that they be removed and existing drinking fountains used and/or installed.

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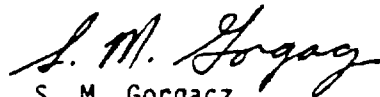
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3. All reports, records, sampling forms, safety meeting records should be written in ink, not penciled. Deletions, additions, and corrections to reports or records should be in ink and initialed by the author.
4. Employees do not make it a practice of showering at the end of the shift, even though facilities are available. If good industrial hygiene practice are to be followed, showers by employees should be made mandatory to keep asbestos fibers from leaving the workplace.
5. Analysis of the vent gas from the cell drier stack should be documented to verify that no "visible emission" of asbestos occurs.

The auditors wish to commend the Industrial Hygiene Department for the obvious effort and professionalism shown by the program developed at Cell Service. However, it is also obvious that plant supervision (Roddey Peebles) and contractor industrial hygiene support (Dean Walters) have a very good working relationship with both groups producing an excellent product with a raw material of extreme sensitivity in a manner consistent with Dow's goal of maintaining a healthy work environment.



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