



DOW CHEMICAL U.S.A.

April 9, 1987

MIDLAND, MICHIGAN 48674

PLAINTIFF'S EXHIBIT

DOW-1347

L. W. Alexander, Michigan Division, 47
H. M. Bell, Louisiana Division, Plaquemine, LA
B. O. Bowley, E&CS, Houston, TX
T. S. Christensen, Field Distribution, 2020 WHDC
A. R. Custer, Western Division, Pittsburg, CA
T. B. Craig/P. J. Fisher, 2020 WHDC
J. D. Dawson, CD Medical, Inc., Miami, FL
J. B. Dudley, Texize, Greenville, SC
W. A. Fluke, Merrell Dow, Cincinnati, OH
L. A. Jasper, Consumer Products, Indianapolis, IN
J. M. Szollosi, Eastern Division, Strongsville, OH
D. D. Worman, Texas Operations, B-101, Freeport, TX
J. D. Young, COBA, 2010 WHDC

ST0071994

cc: K. R. Davis, 2020
J. A. Gray, 2030
R. D. Olson, 1803
P. M. Pankratz, 2020
R. A. Smith, 2030

Attached is the summary of OSHA/MSHA inspection activity in Dow U.S.A. during 1986.

Dick
Dick Falk
U.S. Area Safety

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Attachment

1986 OSHA Inspections

	<u>Dow</u>		<u>Contractor</u>	
	<u>Safety</u>	<u>Health</u>	<u>Safety</u>	<u>Health</u>
E&CS		No Inspect.		
Marketing		No Inspect.		
Product Departments/COBA		No Inspect.		
CD Medical Inc.		No Inspect.		
Merrell Dow		No Inspect.		
Consumer Products Dept.		No Inspect.		
Texize		No Inspect.		
Western Division	0	1	0	0
Michigan Division	1	0	8	0
Eastern Division	0	1	1	0
Texas Operations	0	1	0	0
Louisiana	0	1	0	2
Total (OSHA) (16)	1	4	9	2

ST0071995

1986 MSHA Inspections

	<u>Dow</u>	
	<u>Safety</u>	<u>Health</u>
Houston Dow Center	2	0
Total (MSHA) (2)	2	0

DOW CHEMICAL U.S.A.
1986 OSHA AND MSHA INSPECTIONS

DATE	LOCATION/PLANT	REASON FOR INSPECT.	CITATION	PENALTY
09/29/86 to 11/13/86	Western Division Pittsburg Plant Chlorine Cal/OSHA	Special Emphasis Program	11 - "Other than Serious"	\$250.00
01/02/86	Ludington Site Michigan Division (Contractor) Dept. of Labor	MIOSHA Construction General Inspection (Contractor - Northern Boiler)	NONE	NONE
01/06/86 to 01/10/86	Midland Site Michigan Division (Contractor) Dept. of Labor	MIOSHA compliance Construction Inspection New Aspirin Plant	NONE	NONE
03/13/86	Ludington Site (Same as 01/02/86)	(Same as 01/02/86)	NONE	NONE
04/01/86	Midland Site Michigan Division 9001 Building Dept. of Labor	Accident Investigation	YES - 2 Items "Other than Serious"	NONE
05/22,23, & 28/86	Midland Site Michigan Division (Contractor) Dept. of Labor	MIOSHA Compliance Construction Inspection (At the AFA Project Rovel New Analytical Lab)	NONE	NONE
05/29/86	Midland Site Michigan Division (Contractor) Dept. of Labor	MIOSHA Construction Accident Investigation (Contractor DAW Hydaker-Wheatlake)	NONE	NONE
10/13/86	Midland Site Michigan Division (Contractor) Dept. of Labor	General Inspection MIOSHA	4 - Proposed	Unknown
11/17/86 to 11/20/86	Midland Site Michigan Division (Contractor) Dept. of Labor	General Inspection MIOSHA	3 - Proposed	Unknown

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1986 OSHA AND MSHA INSPECTIONS

DATE	LOCATION/PLANT	REASON FOR INSPECT.	CITATION	PENALTY
12/01/86 to 12/11/86	Midland Site Michigan Division (Contractor) Dept. of Labor	General Inspection MIOSHA	16 - Proposed	Unknown
01/28/86	Magnolia Plant Eastern Division Calcium Bromide Plant (Contractor)	Routine	NONE	NONE
04/24/86	Columbus Operations Columbus, Ohio Eastern Division	Compliance W/OSHA "Workers Right-To-Know" Program (Haz Com)	NONE	NONE
01/29/86 to 03/05/86	Texas Operations LaPorte Site Phosgene	Special Emphasis Program	SERIOUS Section 5 (a) (1) Valve below safety Valve was not chained open	\$560
			OTHER 1910.151 (c) Safety shower location	\$-0-
			OTHER 1910.20(g) (1) (ii) Access to records	\$-0-
			OTHER 1910.20(g) (1) (i) Availability of Records	\$-0-
			OTHER 1910.1200(d) (5) (ii) MSDS did not include exposure limits	\$-0-
			OTHER 1910.1200(g) (2) (iv) MSDS did not include symptoms	\$-0-
			OTHER 1910.1200(g) (2) (vi) MSDS did not include exposure limit data	\$-0-

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1986 OSHA AND MSHA INSPECTIONS

DATE	LOCATION/PLANT	REASON FOR INSPECT.	CITATION	PENALTY
02/12/86	Louisiana Division Vinyl I Plant	Ethylene Dichloride Release of 02/11/86	NONE	NONE
03/26/86	Louisiana Division (Contractor)	Asbestos Removal	NONE	NONE
09/30/86 to 10/03/86	Louisiana Division Cell Service Block (Contractor)	Complaint from Contract Employee against contractor involving the handling of Asbestos	1 - Serious 11 - "Other-than Serious"	\$ 400.00 \$1680.00
01/08/86 & 06/13/86	Houston Dow Center Lignite Cleaning Facility-Fairfield Texas (Energy Resources Dept.) MSHA	Routine Inspection (EVERY 6 Months)	NONE	NONE



File: OSHA inspections
DOW CHEMICAL U.S.A.

MIDLAND, MICHIGAN 48674

2020 Willard H. Dow Center
May 2, 1988

M. Bator, 47 Building
H. M. Bell, Louisiana Div
T. S. Christensen, 2020
T. B. Craig, 2020
J. D. Dawson, CD Medical
J. B. Dudney, Texize
J. J. Fasone, 2020
W. A. Fluke, Merrell Dow
L. A. Jasper, Consumer Products
H. McCall, E&CS
A. G. Mundt, Freeport
R. J. Rouse, Pittsburg
J. M. Szollosi, Strongsville
J. D. Young, 2010

cc: K. R. Davis, 2020
J. A. Gray, 2020
R. D. Olsen, 1803
P. M. Pankratz, 2020
R. A. Smith, 2030

Attached is the summary of OSHA Inspections at Dow facilities during 1987.

Dick
Dick Falk
U.S. Area Safety

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Attachments

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

Quality
Performance
Means More At Dow

ST0071990

DOW CHEMICAL U.S.A.
1987 OSHA AND MSHA INSPECTIONS

DATE	LOCATION/PLANT	REASON FOR INSPECT.	CITATION	PENALTY
2-2-87 and 2-3-87	Merrell Dow, Cincinnati 44 Building (Contractor)	Contractor - Special Emphasis Program	6 Citations <u>Serious</u> No guardrail on temporary platform(2) <u>Other-Than-Serious</u> • non approved flammable can • no backup alarm on vehicle (2) • exposed electrical receptacle	\$1250
3-3-87	Western Division Pittsburg Plant Sym-Tet	Injury with Hospitalization (Dow DAW Case 3-1-87)	None	None
3-31-87	Eastern Division Riverside Plant	Randomly selected for recordkeeping audit. Special Emphasis Pro- gram	None	None
5-15-87	DCP Inc. Indianapolis	Routine	None	None
2-19, 25, & 26, 1987	Michigan Division Midland Site (Contractor)	General Inspection (MIOSHA)	6 Citations	Unknown
4-2-87	Michigan Division Midland Site (Contractor)	Follow-up to February Inspections	None	None
5-20-87 & 6-1-87 to 6-5-87	Michigan Division Midland Site (Contractor)	General Inspection (MIOSHA)	7 Citations • demolition con- tractors failed to have "demolition survey" report on job site • no crane inspection report with crane or on job site • swing radius of crane not barricaded Continued	Unknown

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5-20-87 & 6-1-87 to 6-5-87	Michigan Division Midland Site (Contractor)	General Inspection (MIOSHA)	7 Citations (Cont.) ● No back-up alarm on construction equipment (end loader) ● grinders being used without guards ● worker in condor without safety belt and lanyard attached ● inappropriate lighting in work area	Unknown
7-14-87	Michigan Division Midland Site 433 C bldg (Contractor)	Asbestos Removal	Yes	None
10-1-87	Michigan Division Midland Site 239 bldg (Contractor)	Demolition Project	3 proposed	Unknown
10-27-87	Michigan Division Midland Site Dewatering Pond (Contractor)	Employee Complaint	None	None
7-14-87	Louisiana Division Cellulose Plant (Contractor)	Contract Employee Complaint - Exposure to asbestos fibers	1 - "Other-than- serious"	None
8-31-87	Louisiana Division Chlorine Plant	Chlorine Release of 8-29-87	None	None



DOW CHEMICAL U.S.A.

May 21, 1987

LOUISIANA DIVISION
P. O. BOX 150
PLAQUEMINE, LOUISIANA 70765-0150
504 389-8000

Ray Gaska, 3701
Mike Nevill, 3502-E
Henry Bell, 4701T

cc: Roddey Peebles, 5601

ASBESTOS HANDLING AUDIT RESULTS

The attached letter contains the findings of the audit team that visited Cell Service on May 6, 1987. The auditors included Rich Chauviere from the Chlor-Alkali Tech Center in Freeport, Fred Sabel, industrial hygienist from the Michigan Division, and Stan Gorgacz, Industrial Hygiene Manager of the Michigan Division. The audit findings were generally very favorable. Five recommendations were made as outlined in the attached letter. I would like to inform you of our decisions and/or corrective actions that resulted from these recommendations.

Recommendation number one: We have installed labels on all tanks, containers and pipes that contain or are used to transport asbestos. The labels contain the proper wording as specified in the asbestos standard.

Recommendation number two: All portable drinking water containers have been moved out of the work area. They are now restricted to an area beside the soft drink machines next to the office area.

Recommendation number three: This has been implemented exactly as recommended.

Recommendation number four: This was discussed in depth and the decision was made to continue to have showering at the end of the work period as an option. Protective clothing is required in all areas where asbestos is handled and decontamination facilities (boot washers and high efficiency vacuum cleaners) are installed for use when employees leave the work area. If employees wish to shower in addition to this then they may do so.

ST0175911