



DOW CHEMICAL U.S.A.

PLAINTIFF'S EXHIBIT

DOW-2481

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TEXAS OPERATIONS
FREEPORT, TEXAS 77541

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DEMOLITION MATERIAL

There seems to be some confusion regarding the Texas Operations policy on demolition material leaving the plant. The Texas Environmental Standard for demolition material, which is attached, states, "No demolition material may leave Texas Operations without clearance from the Material Recovery or Environmental Services departments". For material not cleared through Material Recovery, such as concrete rubble, please check with Environmental Services, either Sheryl or myself, at 4391 or 2805, respectively.

If you have any questions, please call me at 2805.

Marlies Goode
Marlies Goode

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Attachment

ST0408490

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TEXAS OPERATIONS
ENVIRONMENTAL STANDARD

ES-315.1

DISPOSAL OF DEMOLITION MATERIAL

I. SCOPE

This standard is intended to cover all environmental aspects for disposal of material from large and small demolition activities.

II. POLICY

It is the policy of Texas Operations to use procedures for the protection of human health and the environment. No demolition material may leave Texas Operations without clearance from the Material Recovery or Environmental Services Departments.

III. RESPONSIBILITY

- A. Environmental Services (ext. 5211) has responsibility for disposal of demolition material contaminated with PCB's.
- B. Environmental Services (238-4391) is responsible for inspecting demolition material that may be contaminated and determining appropriateness of off-site shipment.
- C. Environmental Health Services (ext. 1281) is responsible for coordinating transfer and disposal of radiation devices.
- D. Environmental Operations (ext. 1176) has the responsibility for all other disposal within Texas Operations.
- E. Material Recovery (ext. 3127) has the responsibility for demolition material destined for reuse, sales outside Texas Operations, and sales to employees.

IV. DEFINITIONS

Demolition material - Material and equipment removed in Texas Operations on large and small demolition jobs, including maintenance or capital work, earth work, stripping operations, and excavations.

V. PROCEDURES

- A. Asbestos removal requires 25 days prior notice. See Asbestos Environmental Standard ES-314. Call Environmental Services Department (ext. 1505).
- B. For disposal of PCB contaminated material, contact Environmental Services Department (ext. 5211).
- C. For transfer or disposal of radiation devices; contact Environmental Health Services (ext. 1281).

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- D. Material and equipment for reuse or for sale outside Texas Operations must be decontaminated and environmentally safe. No demolition material shall be disposed of outside Texas Operations without Environmental Services prior approval.
- D. For on-site material disposal, contact Environmental Operations Department (ext. 1176).

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