

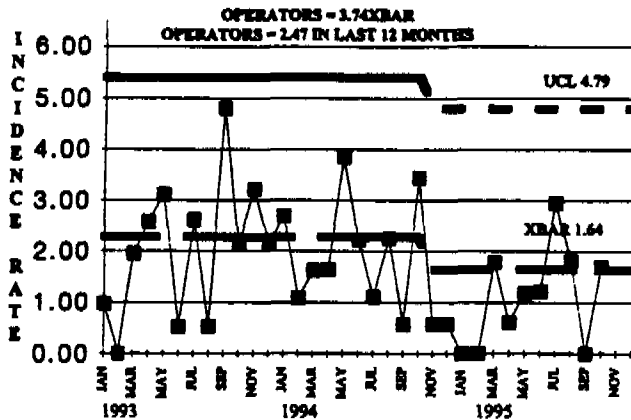
"EXHIBIT I"

DOCUMENTS REQUESTED

1. All reading or correspondence files of Plant Manager or other present or former DOW employee which might reasonably be expected to contain documents relating to industrial hygiene or safety matters or co-operation or participation in any industry sponsored trade association such as the CMA, the API, etc, or any subcommittee or subcommittee of such trade associations concerned with the toxicology, epidemiology, or health and safety matters with regard to benzene, vinyl chloride, or any other potentially toxic substance, including, but not limited to those listed in "Exhibit I."
2. All reading or correspondence files of any industrial hygienist or medical director with responsibility for your facility in Plaquemine between 1960 and 1987.
3. Any document of any kind of nature which relates to industrial health and safety, toxicology, epidemiology, including but not limited to documents received from industry or trade associations or any other document which in any way concerns the potential for exposure to benzene, vinyl chloride, or ethylene dichloride to cause any adverse health effect in humans or animals.
4. Any index of files or documents archived or stored by DOW which might reasonably be anticipated to include references to documents relating to Industrial Health and Safety, Toxicology, Epidemiology, membership in trade associations or any other document which in any way concerns the potential for exposure to benzene, vinyl chloride, or ethylene dichloride to cause any adverse health effect in humans or animals.

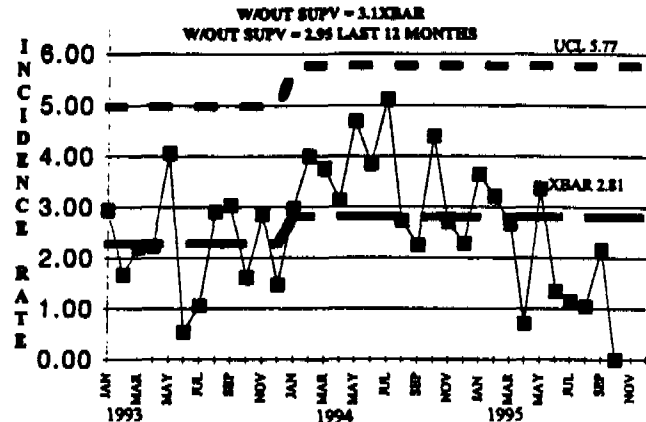
DEST- looks great after

DOW OSHA INCIDENCE RATE



DOW
WEEK OF 10/16 - 10/22

CONTRACTOR OSHA RATE



CONTRACTOR
WEEK OF 10/16 - 10/22

OSHA'S

OSHA'S

NONE

NONE

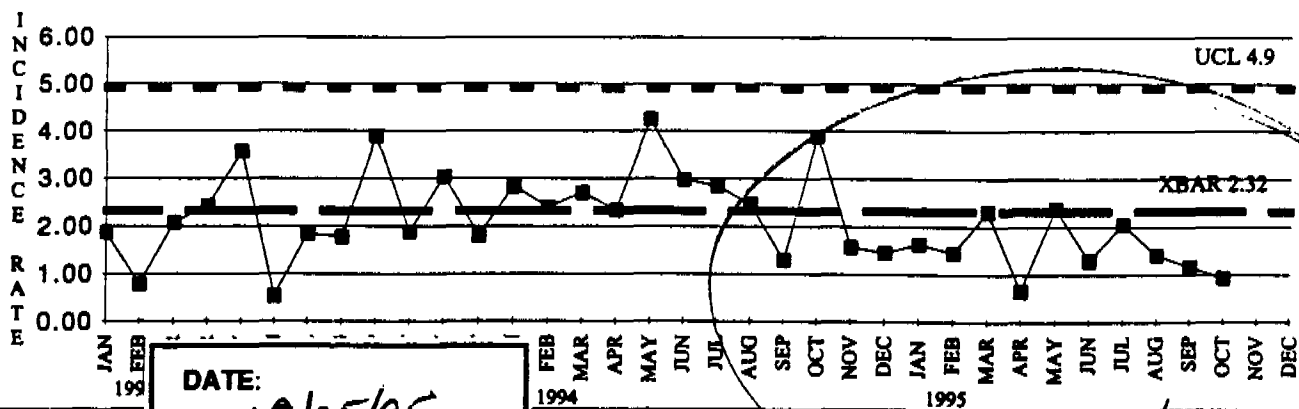
DAYS SINCE LAST DAWC=
MANHOURS SINCE LAST DAWC=

102
1,112,133

DAYS SINCE LAST DAWC=
MANHOURS SINCE LAST DAWC=

22
193,542

SITE OSHA INCIDENCE RATE



DATE:

TO: 10/25/95

W. C. Bernat, B-6650
S. G. Cole, B-4109
D. G. Fontaine, B-3301E
C. R. Holmes, B-3302P
T. E. Leigh, B-1601
J. W. Masey, B-3801
M. J. Sticklen, B-807

FROM: K. F. Hasenbeck
B-2306

10/23/95

DO 144226
CONFIDENTIAL

LOUISIANA DIVISION
SUNRISE MEETING

10/24/95

DIVISION

SAFETY

CHRIS MESSELT

ENVIRONMENTAL REPORT

DOYLE HANEY

OUTSIDE COMPLAINTS

GERRY DAIGRE

% CAPACITY

ART BOURG

PLANT OPERATIONS

POWER & UTILITIES, HYDROCARBONS,
GRAND BAYOU

JOHNNY MASEY

CHLORINE/CAUSTIC,
CHLORINATED HYDROCARBONS

TERRY LEIGH

OXIDES & DERIVATIVES, CELLULOSE, LGTI
VECTOR

BILL BERNAT

POLY A, B & C, CPE

MIKE STICKLEN

ENVIRONMENTAL OPERATIONS

DOYLE HANEY

MAINTENANCE MANPOWER

STAN COLE

DO 144227
CONFIDENTIAL

DOW CONFIDENTIAL

SRAGENDA.XLS



RECD OCT 17 1995

The Dow Chemical Company
P.O. Box 150
Plaquemine, Louisiana 70765-0150

October 13, 1995

Harry Freeman, Executive Director
Louisiana Environmental Leadership
Pollution Prevention Program
Room 804, Engineering Building
University of New Orleans
New Orleans, Louisiana 70148-2212

Dear Mr. Freeman,

On behalf of Dow's Louisiana Division, I'd like to express our support for and intent to participate in the Louisiana Environmental Leadership Pollution Prevention Program. While we have a number of projects and activities currently underway that should qualify for the Program, we would prefer to delay our official application until the first quarter of 1996.

Our Company has recently announced that in 1994, we met our goal to reduce SARA 313 emissions by 50% one year ahead of schedule. We are now in the final stages of drafting our Corporate Environmental Goals for the year 2005, which will include topics such as waste and emission reduction, energy consumption, and public accountability. These will be challenging and significant public commitments and it is our desire to coordinate our participation in the Environmental Leadership Program with our Corporate Goals.

We regret any difficulties this delay may cause, but feel that the resulting improved alignment with our corporate initiatives will be beneficial to all parties.

Sincerely,

Doyle A. Haney
Environmental Manager

Ken,

Do you have any
concerns with this. I'll
await your go ahead before
submitting letter.

Doyle

DO 144228
CONFIDENTIAL

TO:

Bill Bernat, B-6650
Sharon Cole, B-6601
Stan Cole, B-4109
Ken Diamond, B-1901
Ronnie Fitzgerald, B-8601
Dwight Fontaine, B-3301E
Tony Grant, B-807
Nickie Grissom, B-4801
Tim Gunn, B-1701
J. J. Hiemenz, B-8010
Cathy Holmes, B-3302P
Roger Hudson, B-2801
Bill Jackson, B-6801
Charles Jackson, B-1501
Kevin Johnson, B-5701
Gretchen LeBlanc, B-3601
Terry Leigh, B-1601
Johnny Masey, B-3801
Carl Mercer, B-5301
Steve Mims, Grand Bayou
Curt Modtland, B-4350
Steve Parker, B-5501
Dick Speed, B-901
Mike Sticklen, B-807
Don Taylor, B-4605
Rick Thornhill, B-2601
Wayne Turner, B-4501

A really great performance in 1995!

Thanks,

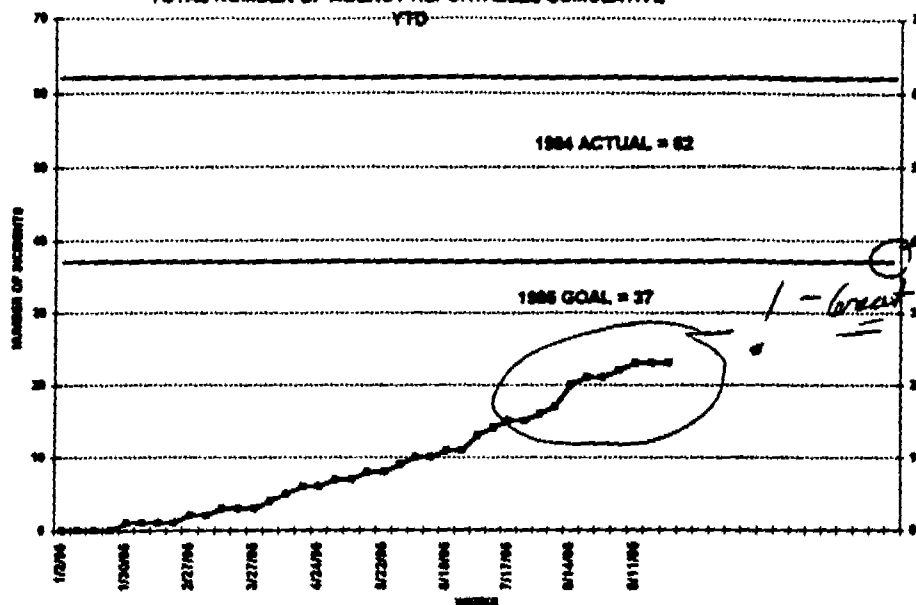
Ken Hasenbeck

jzs/10-2-95

DO 144229
CONFIDENTIAL

WEEKLY ENVIRONMENTAL REPORT

TOTAL NUMBER OF AGENCY REPORTABLES CUMULATIVE YTD



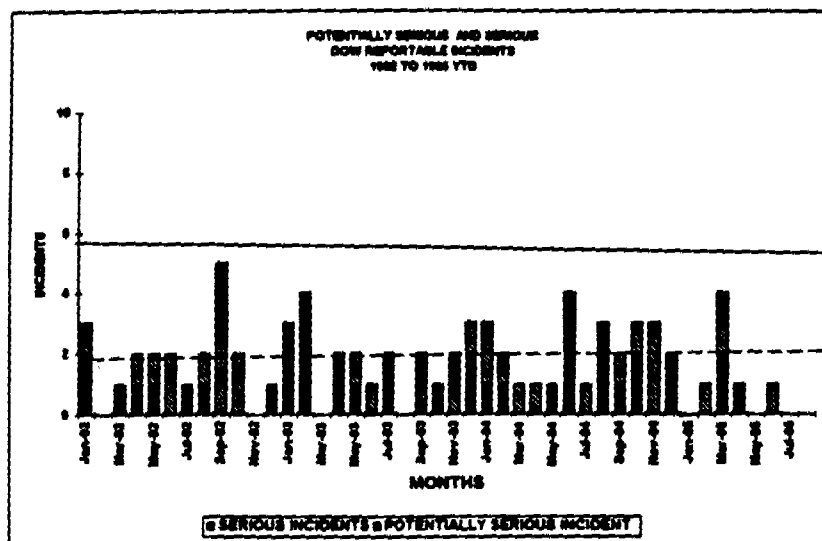
	AGENCY REP. SPILLS	WATER NONCOMP.	AIR PER EXCEED.	AGENCY TOTAL	PSEI	SEI
LAST WEEK	0	0	0	0	0	0
YEAR TO DATE	13	4	6	23	4	2

AGENCY REPORTABLES LAST WEEK (WEEK ENDING 9/25/96)

NONE THIS WEEK

POTENTIALLY SERIOUS AND SERIOUS INCIDENTS

NONE LAST WEEK



9/25/96

DO 144230
CONFIDENTIAL



State of Louisiana

Department of Environmental Quality

Edwin W. Edwards
Governor

William A. Kucharski
Secretary

*Thanks, Great job
by La Div team
Bob Gallant
9/25/95*

September 18, 1995

*Pay K. Hines
10/4/95
Bob Gallant
EYZ.
Ken Hasenbeck
9/19/95*

Mr. Ken Hasenbeck, General Manager
Dow Chemical U.S.A.
Post Office Box 150
Plaquemine, LA 70765-0150

Re: Annual Compliance Inspection

Dear Mr. Hasenbeck:

On August 14 & 15, 1995, Kristina Killen and Karen Blakemore of the Air Quality Division visited your facility for the purpose of determining compliance with the LESHAP Regulations. They were assisted by Messrs. Bruce Alexius, David Mihalik, David Wesson, Bob Brady, and other plant personnel.

According to the report no emission problems were noted at time of inspection.

We appreciate the cooperation that we received in this matter. If we may be of assistance to you in your efforts to comply with our program requirements, please contact our Capital Regional Office at (504) 295-8910.

Sincerely,

Mani
Serugudi R. Mani
Regional Program Coordinator

SRM:KK:ccw
c: Ben Potier

DO 144231
CONFIDENTIAL



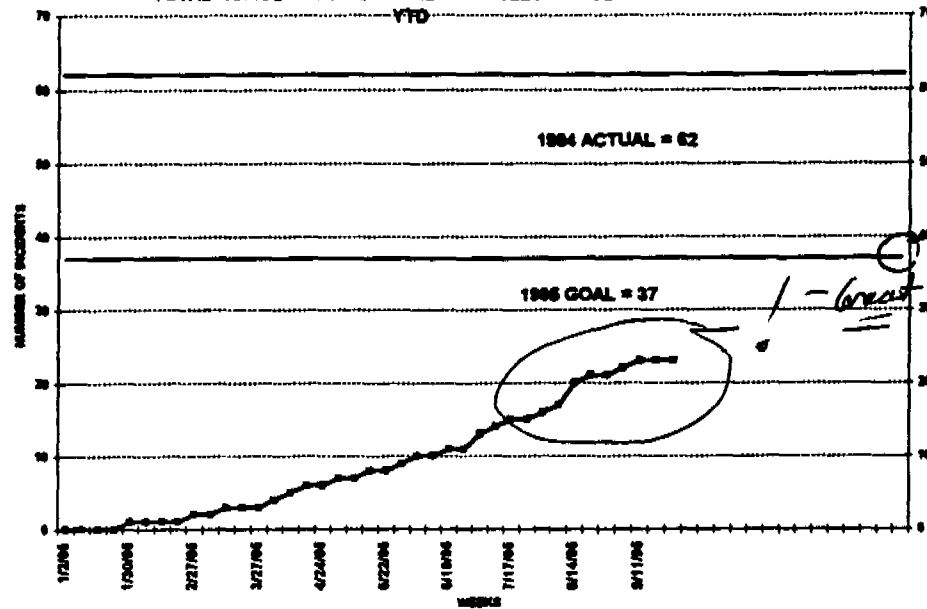
OFFICE OF AIR QUALITY P.O. BOX 82135 BATON ROUGE, LOUISIANA 70884-2135

AN EQUAL OPPORTUNITY EMPLOYER



WEEKLY ENVIRONMENTAL REPORT

TOTAL NUMBER OF AGENCY REPORTABLES CUMULATIVE



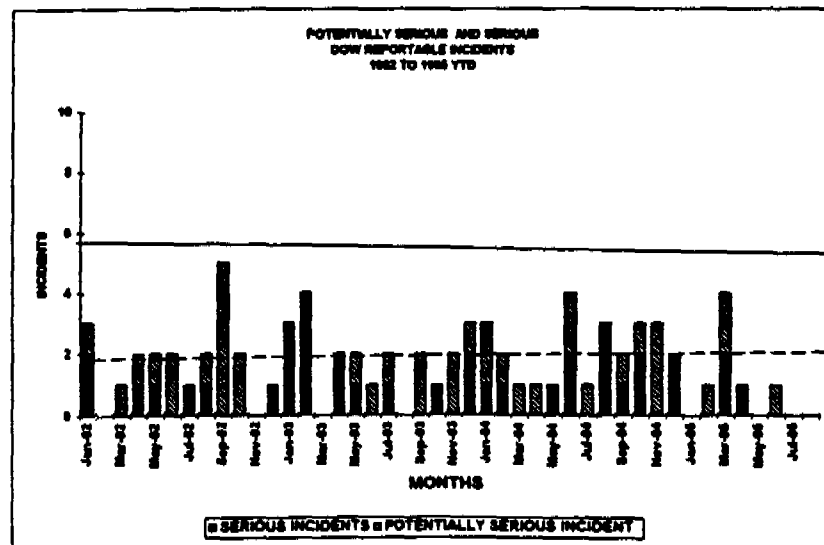
	AGENCY REP. SPILLS	WATER NONCOMP.	AIR PER EXCEED.	AGENCY TOTAL	PSEI	SEI
LAST WEEK	0	0	0	0	0	0
YEAR TO DATE	13	4	6	23	4	2

AGENCY REPORTABLES LAST WEEK (WEEK ENDING 9/25/96)

NONE THIS WEEK

POTENTIALLY SERIOUS AND SERIOUS INCIDENTS

NONE LAST WEEK



DO 144232
CONFIDENTIAL

August 23, 1995

The Dow Chemical Company
P.O. Box 150
Plaquemine, Louisiana 70765-0150

Ken Hasenbeck
Bldg. 2306

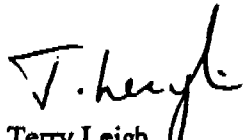
cc: Greg Schultz
Gretchen LeBlanc
Rick Thornhill

Re: YOUR QUESTION ON ATTACHED INCIDENT

I have examined the data related to environmental incidents and there has been a significant improvement in our performance. We have had a number of caustic leaks and our 3 Dow reportable caustic leaks have occurred in the past 2 months (See table).

As you know we have gone through an intensive review of our piping systems and have developed a prioritized plan to work on them. The criteria we used is going to have us working on chlorine systems as a priority over caustic. This is still the right game plan and we are going to stick to it. The result may be slower improvement on other leaks than we might wish. We will achieve improvement in agency and Dow reportables, will reduce the risk of a more significant incident with external impact, will meet maintenance and capital spending goals and will continue improvement of asset utilization.

There are several caustic lines that are in unacceptable condition that will be repaired/replaced between now and the end of the year.


Terry Leigh
CA & Derivatives
Production Manager

mas

DO 144233
CONFIDENTIAL



CC Top case - Jeff H.

Important Thunderden, the
REC'D AUG 29 1995
8/31/95

August 22, 1995

Chris Messelt
Stan Cole

xc: Lloyd Daniel

The Dow Chemical Company
P.O. Box 150
Plaquemine, Louisiana 70765-0150

Jeff,
Thanks for the
follow up report. Tell
your folks Thanks!
A regular report should be provided
at least annually

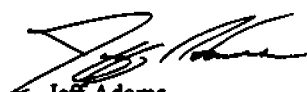
UPDATE ON LOUISIANA DIVISION'S CATHODIC PROTECTION PROGRAM

The Spill Prevention Task Force was formed to determine the steps necessary to prevent hazardous chemical spills within the division. One of the action items generated by the Task Force was to have Maintenance Technical Services assume ownership of the Division's existing Cathodic Protection Program. *Stan*

A focal point from Maintenance Technical Services was appointed to assess the Division's cathodic protection. Dan Dunn, Mark Bartel, and members of the Texas Division, surveyed the division, and recommended the installation of eight deep wells to enhance the Division's protection. Figure 1 illustrates the protection that existed at that time. Unprotected areas, that is areas greater than negative 700 millivolts, are shown in red. Marginal areas, areas between negative 700 millivolts and negative 850 millivolts, are shown in green. Upon completion of the survey, existing Division rectifiers were inspected and repaired as necessary. In addition to this, the eight new deep wells were installed and energized. Figure 2 shows the results of these efforts. A significant reduction in the unprotected and marginal areas has occurred over the past several months. The protection continues to improve as the ground becomes more polarized. Safety concerns were raised before the deep wells were energized. The concerns centered around the fact that a small amperage exists in piping that is cathodically protected. When this piping is unbolted and separated, the potential for spark generation exists. No incidents have been reported since the deep wells were energized.

All division rectifiers are now being periodically monitored for effectiveness, and pipe to ground surveys are continuing to assess the division's protection. A cost estimate to provide total division protection has been estimated at \$50,000. This will provide the necessary anodes and one additional deep well and will insure total division protection. This money has been approved through the LAD Utilities Group.

The results speak for themselves, the MTS materials group has done an excellent job assessing and improving the division's cathodic protection. Manpower to support this program has not been increased, and the program's cost has been minimal.


Jeff Adams
MTS Superintendent

DO 144234
CONFIDENTIAL



The Dow Chemical Company
P O Box 150
Plaquemine, Louisiana 70765-0150

September 27, 1995

Bruce Alexius
Ervin Antoine
Bob Brady
Christine Baldridge
Mike Brown
Wiley Fisackerly
Hank Grace
Denise Hale
Lynne Hanrahan
Billy Hood

Dan Jones
Michelle Kelley
Dave Mihalik
Mark Mitchell
Marty Morrison
Kenny Phillips
Greg Schultz
Paul Soileau
Joe Thomas
Geraldyn Trabeaux
David Wesson

The recent air inspection by the Louisiana Department of Environmental Quality not only resulted in no deficiencies cited, but also resulted in praise given for unique programs that you put in place to assure compliance. This is a testament that putting safety and environmental first does not necessarily result in pounds second, but that commitment is there when conflicting pressures ensue.

Thank you for your outstanding performance.

Ken Hasenbeck
Vice President &
General Manager
Louisiana Division

sb

DO 144235
CONFIDENTIAL



The Dow Chemical Company
P.O. Box 150
Plaquemine, Louisiana 70765-0150

September 15, 1995

W. C. Bernat, B-6650
S. G. Cole, B-4109
D. G. Fontaine, B-3301E
C. R. Holmes, B-3302P
W. B. Horton, B-2509
T. E. Leigh, B-1601
J. W. Masey, B-3801
M. J. Sticklen, B-807

Attached is a summarized set of recommendations from the Reactive Chemicals Study Group. I have asked Terry Leigh to take the lead on getting these recommendations implemented and have asked him to co-chair the Reactive Chemicals Committee. Please help Terry get these changes implemented as soon as practical.

Thanks,

Ken Hasenbeck

jzs

Attachment

DO 144236
CONFIDENTIAL

**REACTIVE CHEMICALS PROCESS IMPROVEMENT TEAM
RECOMMENDATIONS AND ACTION ITEMS**

1. DRST shall set a uniform and consistent policy for the reactive chemicals process.
 - Name a manufacturing manager as Reactive Chemicals Committee co-chair.
(End of September, 1995).
 - Adopt recommendations for Reactive Chemicals Committee team membership.
(End of September, 1995).
 - Adopt the New Superintendent Review process.
(End of September, 1995).
 - Change the focus of the periodic reactive chemicals audit--management systems' audit.
(End of September, 1995).
 - Maintenance and Inventory Management shall own the reactive chemicals' operating discipline for ensuring correct materials and equipment are ordered and installed.
(End of September, 1995).
2. Production manager Reactive Chemicals Committee co-chair shall ensure that appropriate goals and KPI's are established for the Reactive Chemicals Committee. Production managers shall set consistent goals for their respective areas.
(End of December, 1995).
 - Managers shall ensure appropriate reinforcement is implemented throughout the chain of command.
3. Ken will get buy-in from technology centers involved with LAD operations to enhance the technology centers' role in the reactive chemicals process, as defined by the PIP behaviors.
(End of December, 1995)
4. Reactive chemicals focus will be included in the roll-out to the Division so that the Division leadership group understands their respective roles in the process.
(October 2, 1995)



Greater Baton Rouge Industrial Managers Association

UNIVERSAL PLAZA, 5215 ESSEN LANE, SUITE SIX
BATON ROUGE, LOUISIANA 70809
TELEPHONE: (504) 769-0596 FAX # (504) 769-0289

SEP 13 1995

Hal G. Ginn
Theron G. Ladner

Chairman
Executive Director

Stanley
For your use
[Signature]
9/18/95

FROM: HAL GINN, CHAIRMAN, GREATER BATON ROUGE INDUSTRIAL MANAGERS
ASSOCIATION, INC. (GBRIMA)
RON ANDERSON, CHAIRMAN, LABOR STEERING COMMITTEE

TO: PLANT SAFETY GROUP MEMBERS
GREATER BATON ROUGE INDUSTRIAL MANAGERS ASSOCIATION, INC.
(GBRIMA) MEMBERS

We have been collecting OSHA type data and have made plans to develop these statistics for analysis. Dr. Helmut Schneider, Department of Quantitative Business Analysis, College of Business Administration has agreed to assist in establishing the computer program from which the data can be analyzed. It is anticipated that the first report will be completed mid June 1995.

Please have the completed forms on both plant employees and contractor employees back in the Greater Baton Rouge Industrial Managers Association, Inc. (GBRIMA) office by October 15, 1995.

9/15/95 OSHA DATA

DO 144238
CONFIDENTIAL

From: LACSDC::STROXCLAIR 2-AUG-1995 14:12:10.34
To: @LEADERSHIP.DIS
CC: STROXCLAIR
Subj: SITE SAFETY PERFORMANCE

Our overall site safety performance both Dow and contractor is truly outstanding in 1995. Through your personal involvement and use of the behavior-based safety process, you have truly changed the safety paradigm. Please give my thanks to all of your folks for an outstanding result year-to-date.

As we look to the second half of 1995, we must keep our focus on behaviors and reinforcement of the desired safe behavior. There were 4 Dow OSHA injuries in July. This compares to 8 for the first 6 months of 1995. To make certain that this is not an upward trend, your help is requested. Please review your actions and plans to eliminate injuries and review progress with your leadership team to ensure that the outstanding performance we had earlier this year is sustainable. Let's really get focused in the second half of 1995 by setting a target of less than 2 Dow OSHAs and less than 2 contractor OSHAs per month for the next 2 months. With continued efforts from everyone, I know we can do it.

Thanks again for all your leadership.

Ken Hasenbeck

DO 144239
CONFIDENTIAL

TO: LACSDC::U134470 ! {U134470} BERNAT, WILLIAM (WC), 504-353-8034
LACSDC::SGCOLE ! {U432871} COLE, STAN (SG), 504-353-6131
LACSDC::FONTAINE ! {U432375} FONTAINE, DWIGHT (DG), 504-353-8330
LACSDC::HOLMES ! {U432287} HOLMES, CATHY (CR), 504-353-5854
LACSDC::U912532 ! {U912532} LEIGH, TERRY (TE), 504-353-8913
LACSDC::MASEY ! {U432948} MASEY, JOHNNY (JW), 504-353-1549
LACSDC::STICKLEN ! {U738537} STICKLEN, MIKE (MJ), 504-353-8591

SUBJECT: SAFETY PERFORMANCE

Our Dow safety performance was very poor in July--five Dow OSHA's and almost a sixth. Please relight the fires and the focus on Dow injury reduction. We still have a chance to meet our 1995 targets, but only if we turn it around now!

Please lead the change!

Ken

jzs/8-8-95

DO 144240
CONFIDENTIAL



Building 2306
July 20, 1995

The Dow Chemical Company
P.O. Box 150
Plaquemine, Louisiana 70765-0150

Sharon Cole, Vinyl 2, B-6601
Ken Diamond, CPE, B-1901
Ronnie Fitzgerald, Poly C, B-8601
Tony Grant, Poly A, B-807
Nickle Grissom, LHC 2, B-4801
Tim Gunn, Solvents/EDC I, B-1701
J. J. Hiemenz, Environmental Operations, B-8010
Roger Hudson, Power & Utilities, B-2801
Bill Jackson, LHC 3, B-6801
Charles Jackson, Glycol I, B-1501
Kevin Johnson, LGTI, B-5701
Gretchen LeBlanc, CA 2/Caustic, B-3601
Carl Mercer, Glycol 2, B-5301
Steve Mims, GBO
Curt Modtland, Vector@SBC, B-4350
Steve Parker, Ethanolamines/Glycol Ethers, B-5501
Dick Speed, Poly B, B-901
Don Taylor, Methanes, B-4601
Rick Thornhill, Chlorine, B-2601
Wayne Turner, Cellulose, B-4501

cc: Bill Bernat, B-6650
Terry Leigh, B-1601
Johnny Masey, B-3801
Mike Sticklen, B-807

REACTIVE CHEMICAL INCIDENTS

The attached data indicates our frequency of reactive chemical incidents is on the increase. I am extremely concerned about this trend. Please review your reactive chemicals procedures and make sure your teams are sensitive to this most critical area. It is our responsibility to ensure that chemicals are handled in a safe manner.

Kevin Johnson is looking at our overall reactive chemicals program for any changes that are needed for the long haul. My immediate concern is that we reverse the trend we are on **QUICKLY!**

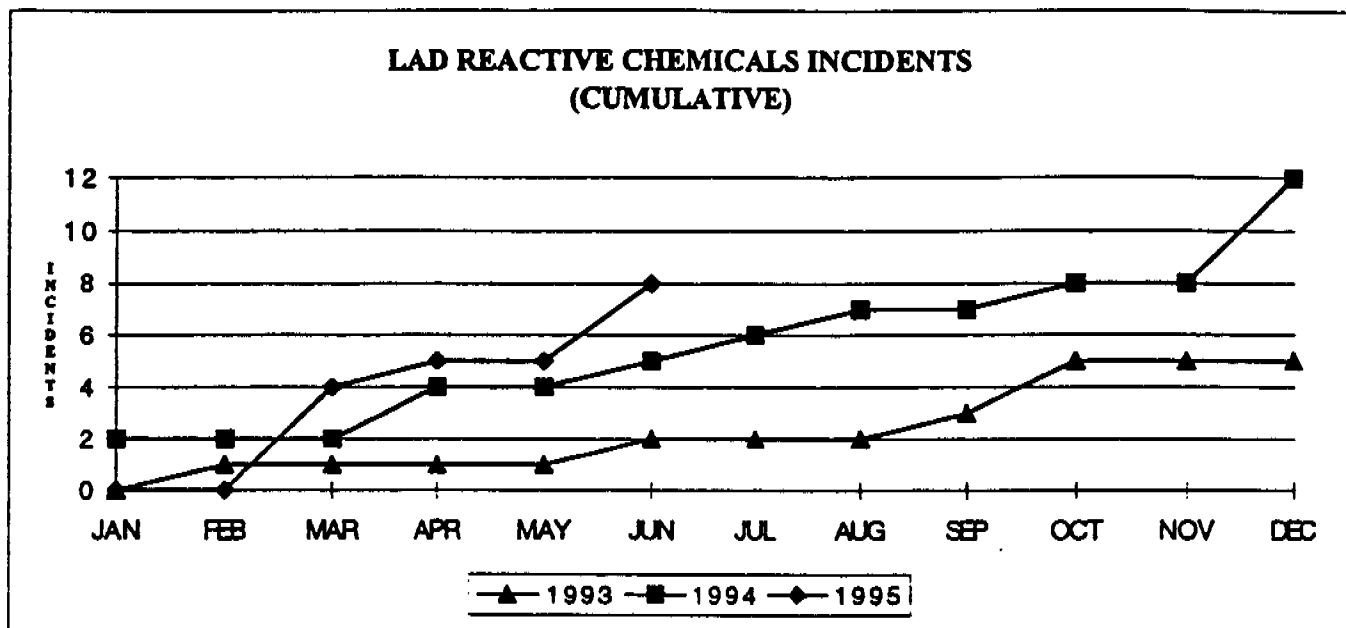
Thanks in advance for your help.


Ken Hasenbeck

jzs

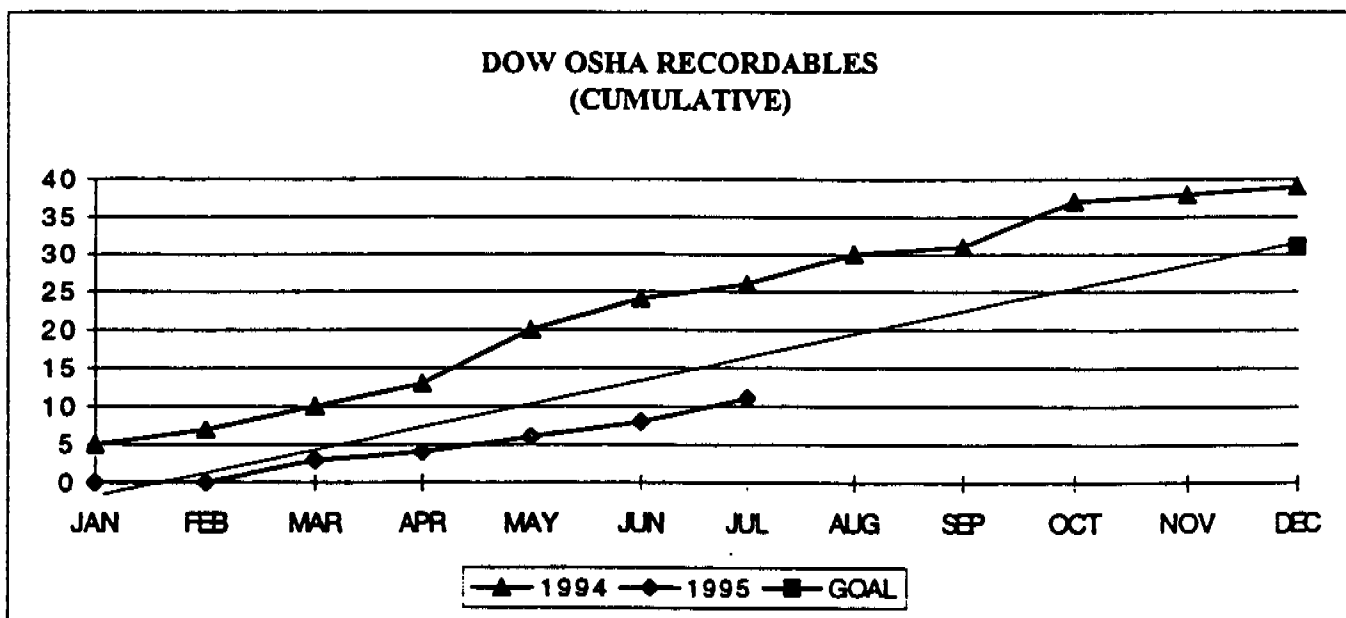
Attachment

DO 144241
CONFIDENTIAL



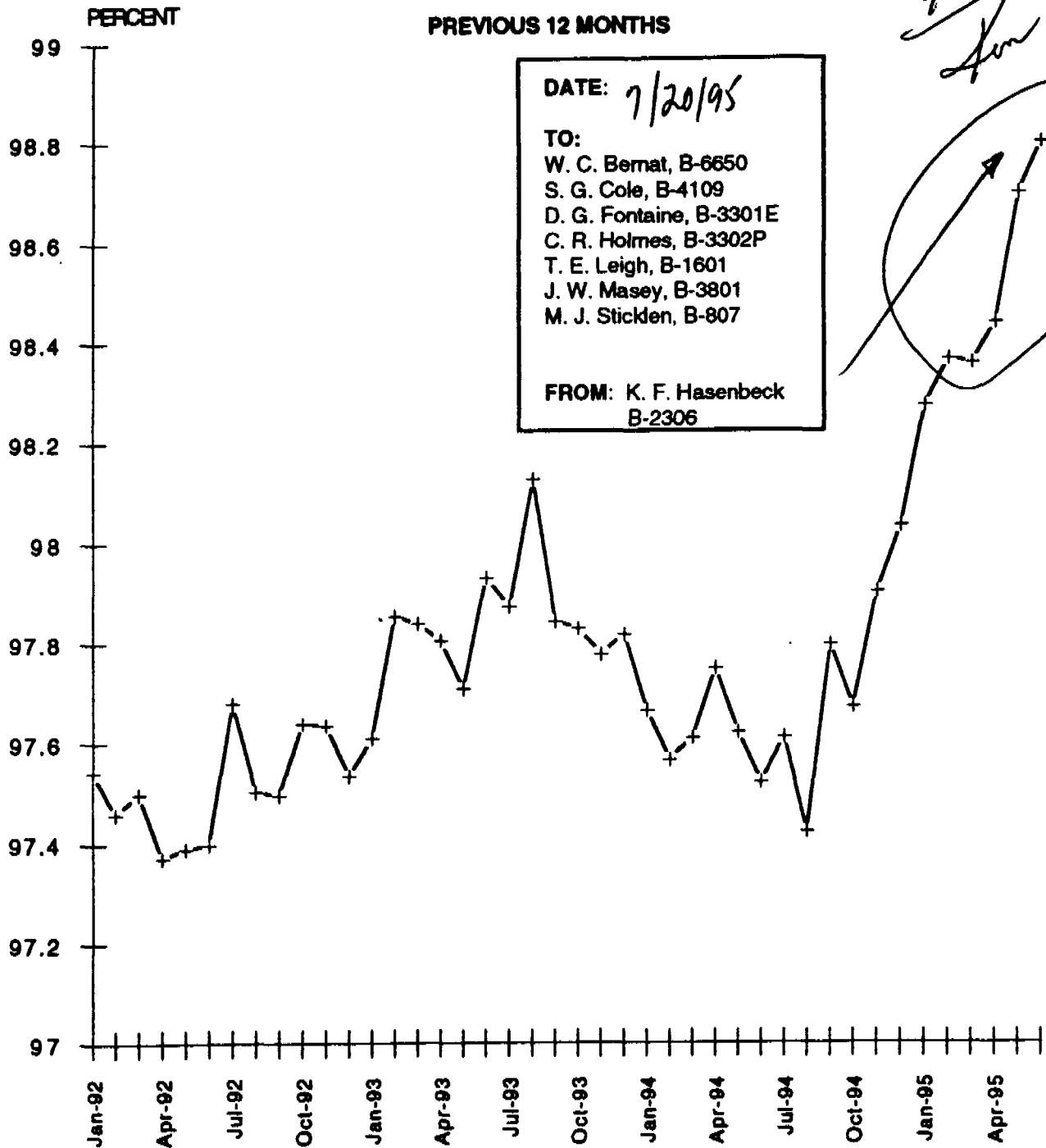
1995 INCIDENTS
JUNE

THREE



**LOUISIANA DIVISION
OSHA RECORDABLE FREE EMPLOYEES
PREVIOUS 12 MONTHS**

*DEST
Really
great!
for*



DO 144243
CONFIDENTIAL

7/19/95

**LOUISIANA DIVISION
SAFETY & LOSS PREVENTION STATISTICS
JUNE 1995**

<u>DOW</u>	<u>Month</u>	<u>YTD 1995</u>	<u>1994 Total</u>
OSHA Medical Treatment Cases (Incident Rate)	0	5 (0.50)	19 (0.88)
OSHA Restricted Work Cases (Incident Rate)	1	2 (0.20)	10 (0.46)
Days Restricted	1	4	80
OSHA Day Away Work Cases (Incident Rate)	1	1 (0.10)	10 (0.46)
Days Away	4	4	74
Total OSHA Recordables (Incident Rate)	2 (1.21)	8 (0.78)	39 (1.81)
Manhours	331,841	2,012,682	

<u>Contractor</u>			
OSHA Medical Treatment Cases (Incident Rate)	0	11 (1.03)	33 (1.75)
OSHA Restricted Work Cases (Incident Rate)	2	9 (0.84)	22 (1.17)
OSHA Day Away Work Cases (Incident Rate)	0	5 (0.47)	11 (0.58)
Total OSHA Recordables (Incident Rate)	2 (1.00)	25 (2.33)	66 (3.50)
Manhours	308,955	2,145,549	

<u>Site</u>			
Total OSHA Recordables (Incident Rate)	4 (1.09)	33 (1.59)	105 (2.60)
Manhours	730,506	4,158,231	

<u>Dow Off The Job Cases (Incident Rate)</u>	0 (0.00)	7 (0.39)	37 (0.95)
Work Days Lost	0	16	110

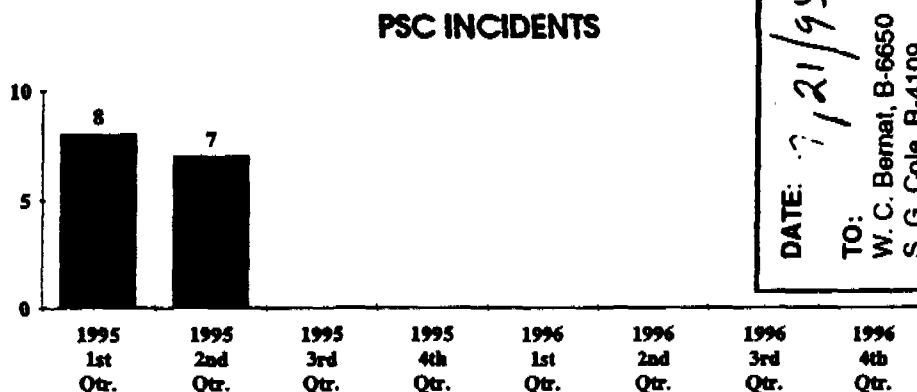
<u>Dow Industrial Injuries</u>	7	37	101
--------------------------------	---	----	-----

<u>Dow PSA's</u>	7	27	57
------------------	---	----	----

	<u>DOW</u>				<u>Contractor</u>				<u>SITE</u>			
	<u>1994</u>		<u>1995YTD</u>		<u>1994</u>		<u>1995YTD</u>		<u>1994</u>		<u>1995YTD</u>	
	<u>No.</u>	<u>IR</u>	<u>No.</u>	<u>IR</u>	<u>No.</u>	<u>IR</u>	<u>No.</u>	<u>IR</u>	<u>No.</u>	<u>IR</u>	<u>No.</u>	<u>IR</u>
HASENBECK	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
BERNAT	9	2.82	3	1.80	9	2.50	4	2.28	18	2.65	7	2.04
COLE	3	1.40	1	1.00	5	4.25	8	2.36	8	2.41	9	2.05
FONTAINE	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
HOLMES	5	1.92	2	1.44	8	6.47	4	6.14	13	3.39	6	2.94
HORTON	3	1.51	0	0.00	2	10.82	0	0.00	5	2.30	0	0.00
LEIGH	4	1.34	1	0.70	13	3.21	4	2.20	17	2.41	5	1.54
LOPEZ	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
MASEY	4	1.30	0	0.00	19	6.31	2	1.35	23	3.78	2	0.68
STICKLEN	9	3.18	1	0.89	8	3.55	3	3.64	17	3.34	4	2.06
UHLMANN	0	0.00	0	0.00	2	49.39	0	0.00	2	4.97	0	0.00
Other	2	2.53			0	0.00			2	2.13		
TOTAL	39	1.81	8	0.79	66	3.50	25	2.33	105	2.60	33	1.59

NORTH AMERICA PROCESS SAFETY PERFORMANCE

KEY PERFORMANCE INDICATOR PROCESS SAFETY CODE INCIDENTS (Reportable to CMA)



DATE: 7/21/95

TO:
 W. C. Bernat, B-6650
 S. G. Cole, B-4109
 D. G. Fontaine, B-3301E
 C. R. Holmes, B-3302P
 T. E. Leigh, B-1601
 J. W. Masey, B-3801
 M. J. Sticklen, B-807

FROM: K. F. Hasenbeck
 B-2306

KEY PERFORMANCE INDICATOR

The key performance indicator will be the number of process safety incidents which occurred as measured by the Process Safety Code Measurement System criteria.

1. Fires or explosions in process areas which cause \$25,000 or more property damage.

OR

2. Chemical releases of more than the threshold quantity of an "extremely hazardous substance" (as defined by SARA Title III Section 302) or a release of 5,000 pounds of a flammable material.

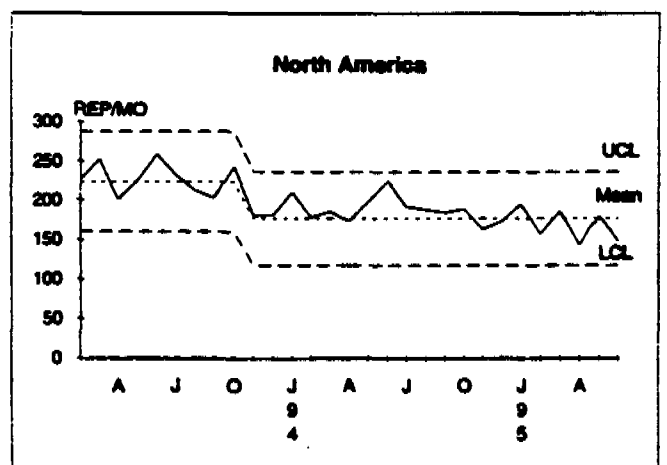
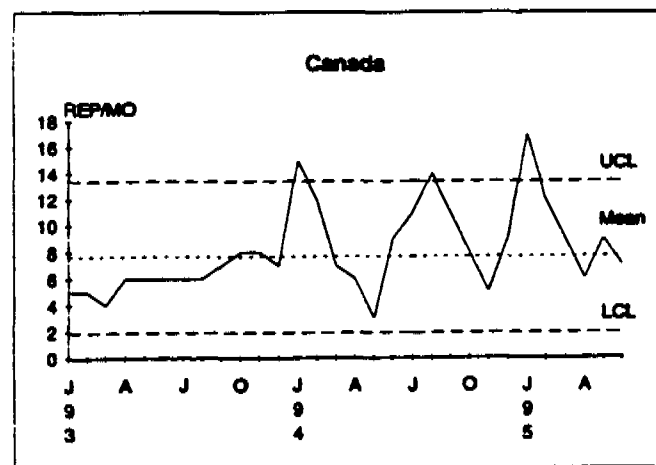
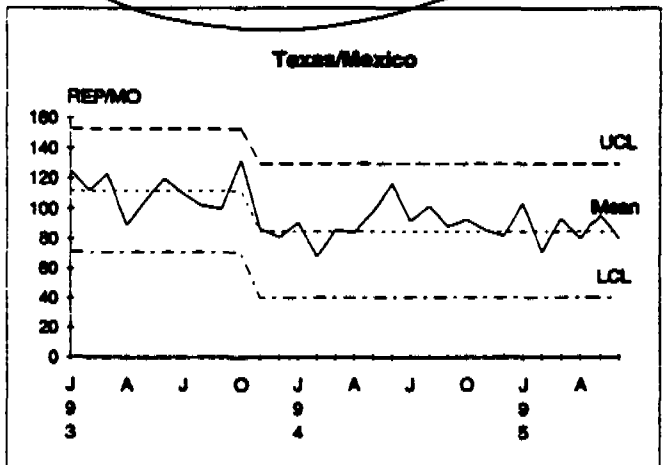
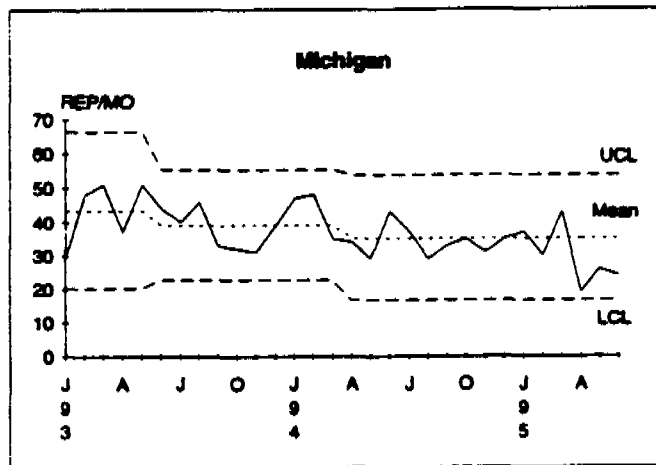
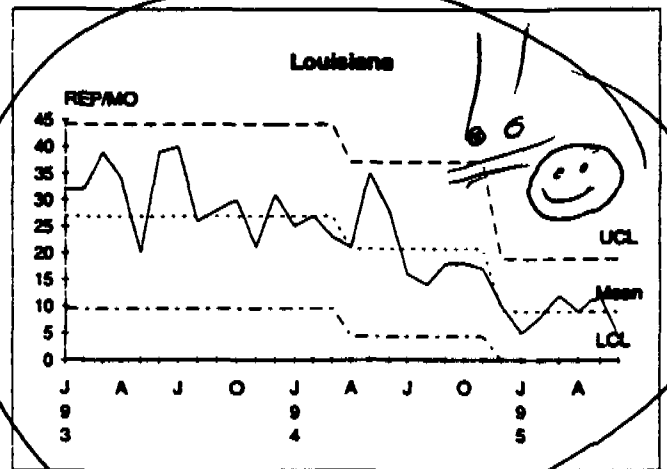
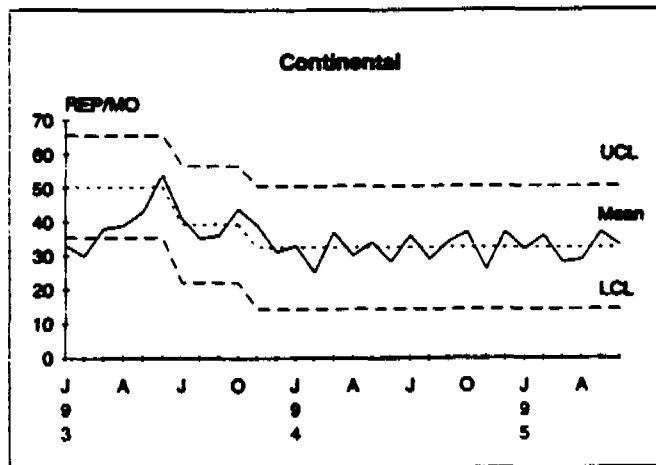
OR

3. Fire, explosion, or chemical release which caused one or more serious injuries (DAW) or fatalities to Dow or contractor employees or overnight hospitalization of non-employees.

These incidents will be reported and tracked to measure our performance and identify opportunities for improvement.

ENVIRONMENTAL INCIDENTS NORTH AMERICA

DRST
Your doing great!
Ken



NOTE: Look for 7 in a row below the mean

From: LARNDC::BLACK "Lori Black, LA R&D, 504-353-1803" 7-JUL-1995 10:*

To: @REPORT.DIS

CC: BLACK

Subj: REACTIVE CHEMICALS REPORT - JUNE 1995

Gary Phillips:

LOUISIANA DIVISION REACTIVE CHEMICALS REPORT - JUNE 1995

1. There were three incidents in June (YTD Total = 8)
2. Ten Reactive Chemical Reviews were held:

REC'D JUL 07 1995

Johnny M
A significant incident
which the real cause
7/10/95

DATE	PLANT - PROJECT	TYPE REVIEW
5/9/95	LHC 3 - Reaction of Cleaning Solution and Hydrocarbons in Waste Bullet Tank	Incident
6/5/95	Glycol 2 - Barge Sampling Incident	Incident
6/6/95	R&D - Emulsions	R&D
6/16/95	Poly C - Magnesium Alkyl Reaction in Waste Bullet Tank	Incident
6/20/95	Chlorine - Brine Consolidation Project	Capital Authorization
6/20/95	Cellulose - Consolidated Audit	Consolidated Audit
6/22/95	CPE - Premix/Packaging Upgrade Project	Capital Authorization
6/28/95	Poly A - Isopar C Recovery Project	Prestartup
6/28/95	CA II - Speed Increase for Chlorine Compression	Process Change
6/29/95	CPE - Consolidated Audit	Consolidated Audit

LAD REACTIVE CHEMICAL INCIDENTS REPORTED IN JUNE

Barge Sampling Incident

A sample from a barge containing ethylene glycol was mistakenly labeled as caustic. The sample was then sent to the Chlor-Alkali lab, instead of Glycol 2, for analysis. The lab technician attempted to titrate the sample with nitric acid and realized there was a problem when the sample started to foam. There were no injuries or property damage.

DO 144247
CONFIDENTIAL

Magnesium Alkyl Reaction in Waste Bullet Tank at Poly C

Residual BEM (Butyl ethyl magnesium) which had been flushed from D-301C with Isopar C was transferred to a waste bullet tank which was thought to be empty. The tank however, had an internal dip leg which prevented removal of all the liquid during the emptying step. The liquid heel



December 1, 1995

The Dow Chemical Company
P.O. Box 150
Plaquemine, Louisiana 70765-0150

Arnold Allemang
2030 Dow Center
Midland

ORGANIZATIONAL RECOMMENDATIONS FOR LOUISIANA DIVISION

Attached are my recommendations for the Louisiana Division organization with the objective of no more than four-six layers. The key concept is the creation of four Manufacturing/Service Excellence Teams aligned as much as possible to business and technology similar areas. To link the four areas together and to provide overall site coordination, a Site Leadership Team comprised of site activity leaders (safety, maintenance, etc.) and representatives (manufacturing superintendents) from the Manufacturing/Services Teams will be formed. We will use two existing business manufacturing leaders to act as coach for the Manufacturing/Service Excellence Teams. One major manager will assume the role of site re-engineering manager and site services coordinator. This role will manage our transition to self-directed work teams and help either coordinate or directly manage miscellaneous site services. In the attachments are diagrams that show our thinking on how key site service functions will be organized.

I think this structure meets the spirit of what you asked for, will let the division continue to function well with me gone part of the time, and gives me 50+ direct reports that I will learn how to handle.

This will be announced as Phase I the week of December 11. We will initially start off with three major manager coaches for the transition period until Mike Sticklen leaves the site with the Dupont/Dow JV and then go to two major manager coaches.

While the site knows the intent is to remove the assistant superintendent and shift leaders (we have only two per plant today) from a direct administrative role, we will not do so until we have gotten the training in place on how to make this system work. Everything I have read on this topic says rushing in without training is a formula for failure. Our training and implementation plan should get us fully implemented by the end of 1996 with our JV plants (Vector@SBC and Dupont/Dow) being the last.

We would like to go ahead with the proposed changes in the Safety and Environmental organization now if possible, but we could wait if need be.

For your review, input and consideration,

Ken Hasenbeck

jzs

Attachments

DO 144248
CONFIDENTIAL

MAJOR MANAGER ROLE CHANGES

Below are my recommendations for changes in major manager roles for the division:

Use two of the business manufacturing leaders as coach for the Manufacturing/Service Excellence Teams.

Bill Bernat--Oxides & Derivatives Business

Manufacturing Coach
Fill in for me when gone

Terry Leigh--Vinyl/EDC Business
(If a high potential person becomes available, this could be the place to move them.)

Manufacturing Coach

Cathy Holmes

Site Re-engineering Manager
Site Services Coordinator

Johnny Masey

Available for re-deployment

Mike Sticklen

Dupont/Dow J.V.--will use as coach until he leaves

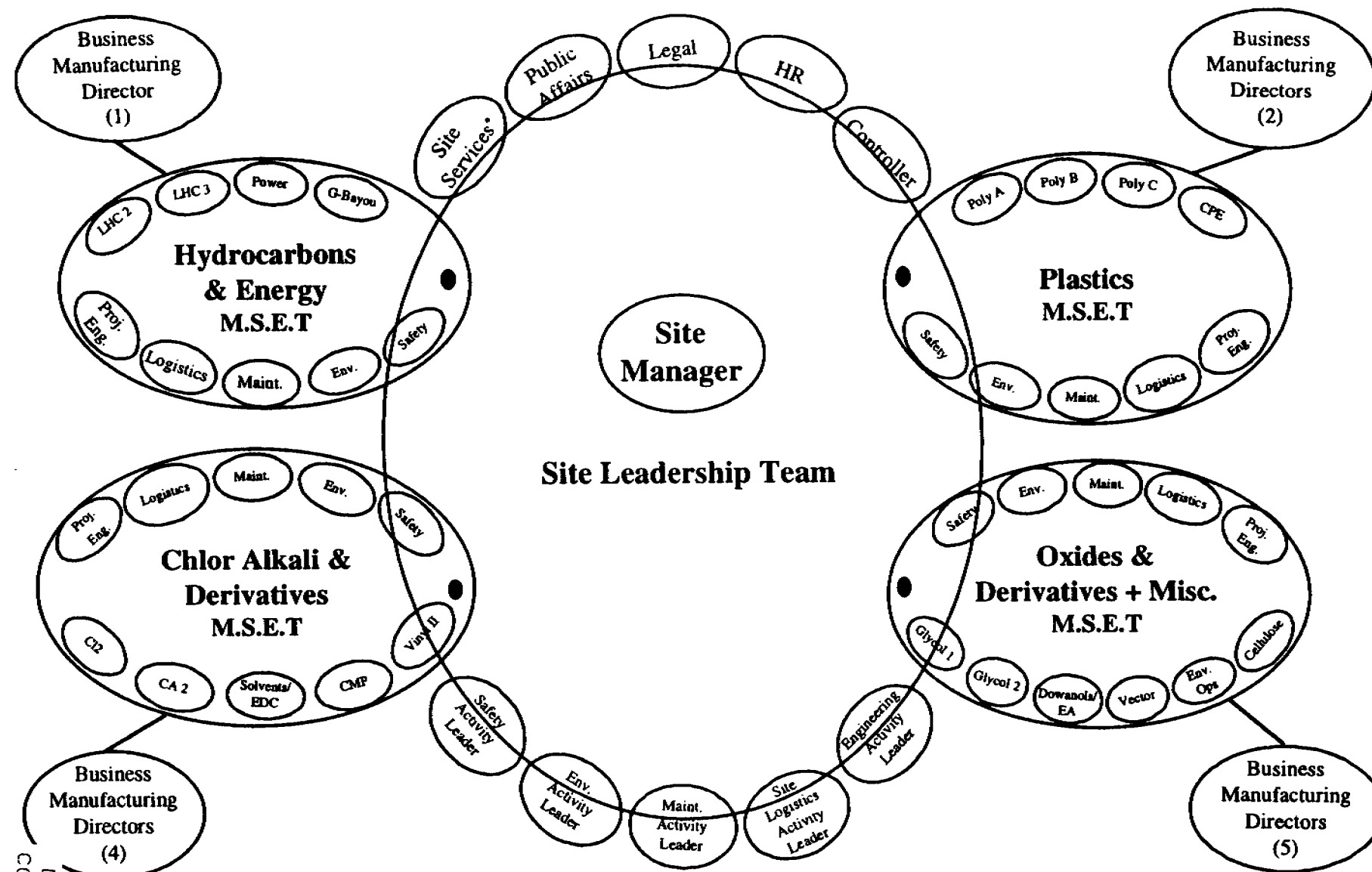
Stan Cole

Maintenance Activity Leader

Dwight Fontaine

Engineering Activity Leader

DO 144249
CONFIDENTIAL



Louisiana Division Organizational Model Overview

○ DRST Membership

* Detailed on Page 2

M.S.E.T. - Manufacturing/Service Excellence Team

● Coach - full or partial person

DO 144250
CONFIDENTIAL

From: LARNDC::BLACK
To: @REPORT.DIS
CC: BLACK
Subj: REACTIVE CHEMICALS REPORT - JUNE 1995

"Lori Black, LA R&D, 504-353-1803" 7-JUL-1995 10:*

Gary Phillips:

LOUISIANA DIVISION REACTIVE CHEMICALS REPORT - JUNE 1995

1. There were three incidents in June (YTD Total = 8)
2. Ten Reactive Chemical Reviews were held:

DATE	PLANT - PROJECT	TYPE REVIEW
5/9/95	LHC 3 - Reaction of Cleaning Solution and Hydrocarbons in Waste Bullet Tank	Incident
6/5/95	Glycol 2 - Barge Sampling Incident	Incident
6/6/95	R&D Emulsions	R&D
6/16/95	Poly C - Magnesium Alkyl Reaction in Waste Bullet Tank	Incident
6/20/95	Chlorine - Brine Consolidation Project	Capital Authorization
6/20/95	Cellulose - Consolidated Audit	Consolidated Audit
6/22/95	CPE - Premix/Packaging Upgrade Project	Capital Authorization
6/28/95	Poly A - Isopar C Recovery Project	Prestartup
6/28/95	CA II - Speed Increase for Chlorine Compression	Process Change
6/29/95	CPE - Consolidated Audit	Consolidated Audit

REC'D JUL 07 1995

Mike S
what's the cause?
& solution?
7/10/95

LAD REACTIVE CHEMICAL INCIDENTS REPORTED IN JUNE

Barge Sampling Incident

DO 144251
CONFIDENTIAL

A sample from a barge containing ethylene glycol was mistakenly labeled as caustic. The sample was then sent to the Chlor-Alkali lab, instead of Glycol 2, for analysis. The lab technician attempted to titrate the sample with nitric acid and realized there was a problem when the sample started to foam. There were no injuries or property damage.

Magnesium Alkyl Reaction in Waste Bullet Tank at Poly C

Residual BEM (Butyl ethyl magnesium) which had been flushed from D-301C with Isopar C was transferred to a waste bullet tank which was thought to be empty. The tank however, had an internal dip leg which prevented removal of all the liquid during the emptying step. The liquid heel



REC'D DEC 11 1995



State of Louisiana
Department of Environmental Quality

Edwin W. Edwards
Governor

December 7, 1995

William A. Kucharski
Secretary

Mr. Ken Hasenbeck
General Manager
The Dow Chemical Company
Post Office Box 150
Plaquemine, LA 70765-0150

Doyle
Send thanks to
plants reviewer
put my name on letter
als/Kr
12/14/95

Re: Annual Compliance Inspection

Dear Mr. Hasenbeck:

On August 14, 15 & 17, 1995, Ms. Karen Blakemore and Kristina Killen of the Louisiana Air Quality Division visited your facility for the purpose of determining compliance with the Louisiana Air Quality Regulations. They were assisted by Messrs. Bruce Alexius, David Mahalik, David Wesson and Ms. Christine Baldridge.

Ms. Blakemore's report indicates that no air emission problems were noted at the time of visit.

We appreciate the cooperation that we received in this matter. If we may be of assistance to you in your efforts to comply with our program requirements, please contact Karen Blakemore of our Capital Regional Office at (504) 295-8910.

Sincerely,

Serugudi R. Mani
Regional Program Coordinator

SRM:KJB:ccw

c: Ben Potier

DO 144252
CONFIDENTIAL



OFFICE OF AIR QUALITY P O. BOX 82135 BATON ROUGE, LOUISIANA 70884-2135

AN EQUAL OPPORTUNITY EMPLOYER





THE CHLORINE INSTITUTE, INC., 2001 L STREET, N.W., WASHINGTON, D.C. 20036-4919

202-775-2790

Fax 202-223-7225

TO: Ken Hasenbeck, Dow Chemical North America
Location Manager

CC: Steve Harper, Official Correspondent

FROM: Arthur E. Dungan *At Dungan*

DATE: December 5, 1995

SUBJECT: 1994 Chlor-Alkali Manufacturing Facilities Incidents Report - Plant Rankings

Charles L. Mears, *Chairman*
Norman E. Thogersen, *Vice Chairman*
Dr. Robert G. Smerko, *President*

REC'D DEC 07 1995

Terryho
F4Z
RD
12/14/95

Separately you have been sent a copy of the 1994 Chlor-Alkali Manufacturing Facilities Incidents Report.

For 1994, 48 manufacturing facilities operating in North America participated in the survey. 19 were Category 1 (less than 200,000 work hours per year) and 29 were Category 2 (200,000 or more work hours per year). The incident rate for total recordable cases (OSHA) showed a decline of 6% from 1993 results. Results were 8% better than 1992.

The following data are presented:

All Facilities	
OSHA Recordable Incident Rate	3.46
Median OSHA Recordable Incident Rate	2.93
Large Facilities (200,000 or More Work Hours)	
OSHA Recordable Incident Rate	2.89
Median OSHA Recordable Incident Rate	2.72
Small Facilities (Less Than 200,000 Work Hours)	
OSHA Recordable Incident Rate	6.97
Median OSHA Recordable Incident Rate	5.66
Your Facility's Performance (Plaquemine)	
OSHA Recordable Incident Rate	2.88
Work Hours	973,766
Your Facility's Ranking Among All Chlor-Alkali Facilities ¹	24
Your Facility's Ranking Among Similar Sized Facilities ²	18

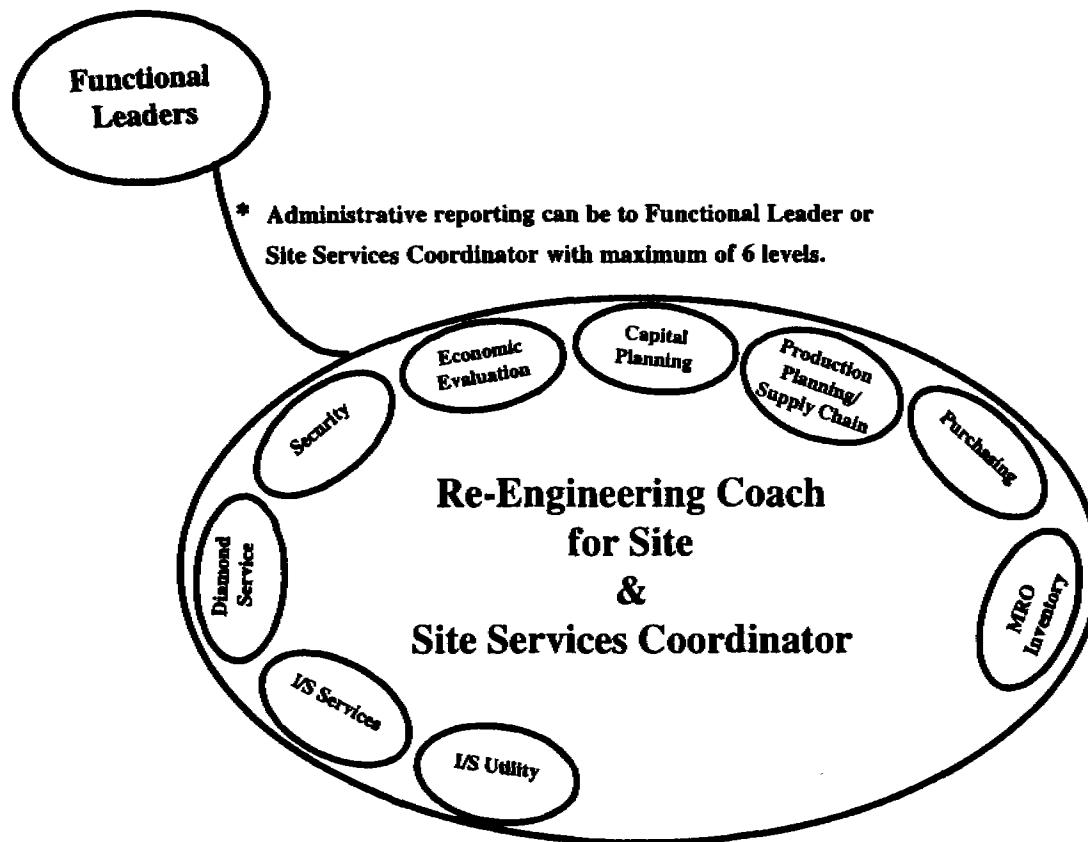
Also attached is a form to update the Chlorine Institute's Location Manager Mailing List. In the event that you have replaced the location manager to which this letter is addressed, please return the attached form to my attention.

¹ 1 = lowest incident rate; 48 = highest incident rate

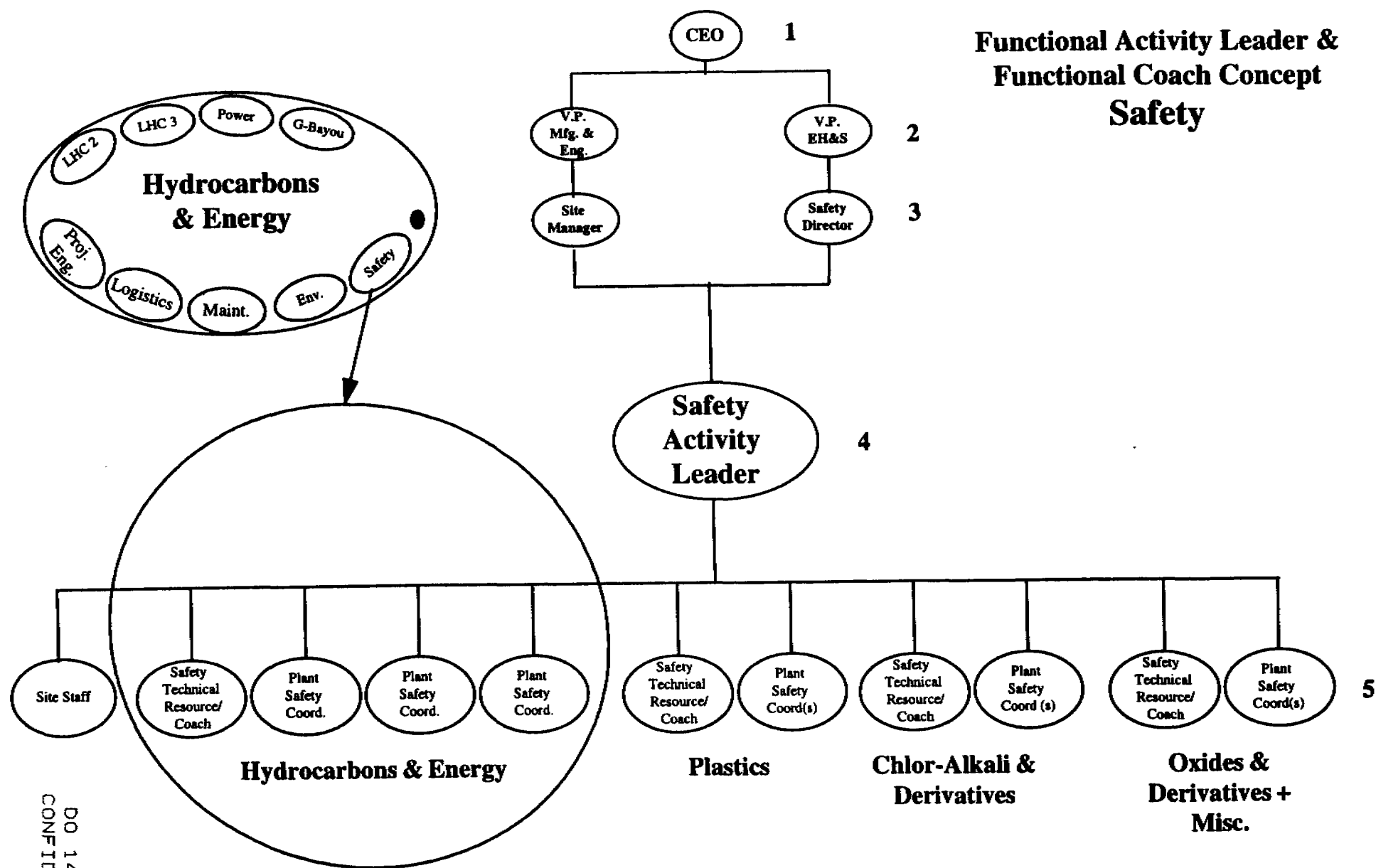
² 1 = lowest incident rate; 19 (Category 1) or 29 (Category 2) = highest incident rate

DO 144253
CONFIDENTIAL

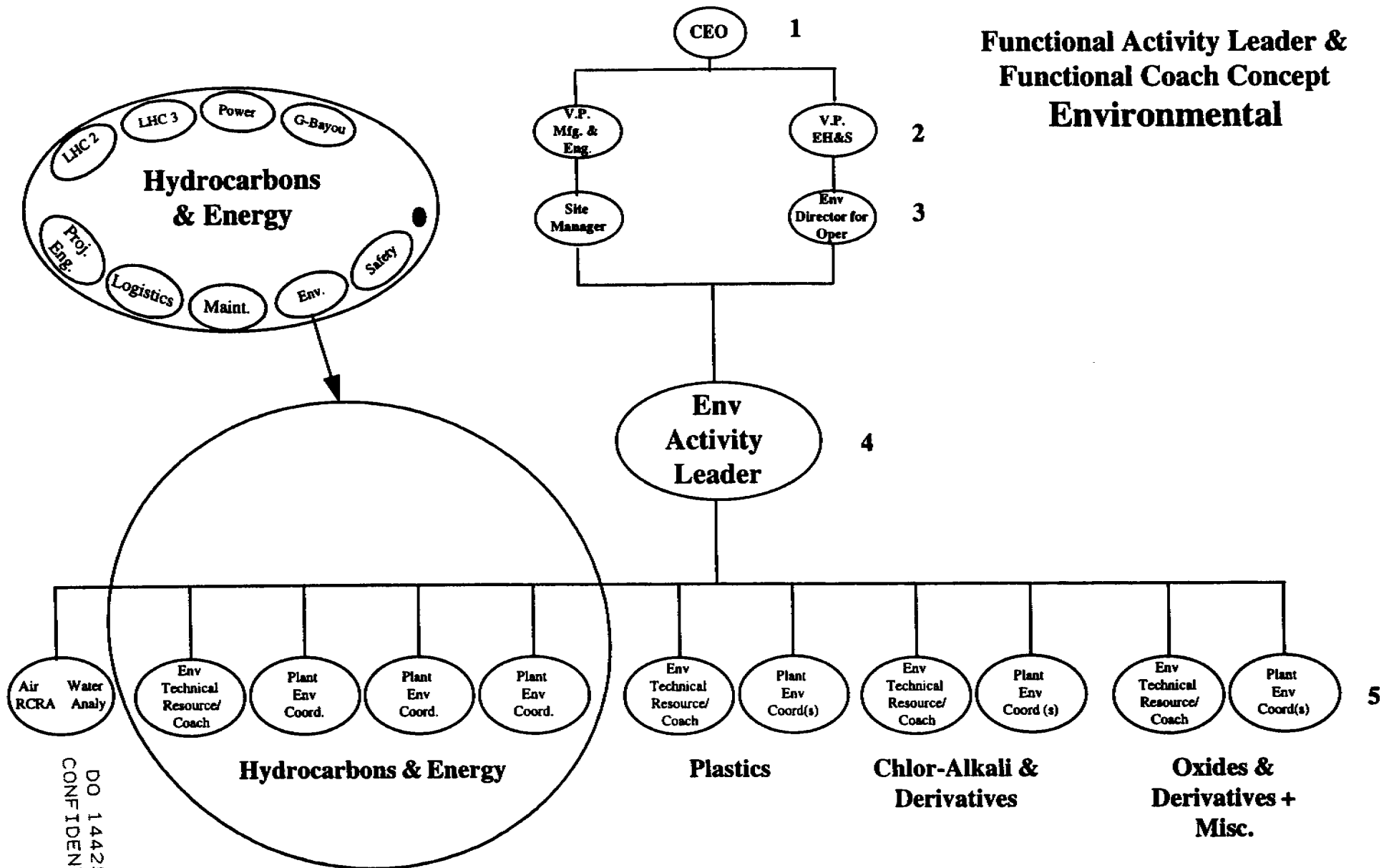
Louisiana Division Site Services Coordination



DO 144254
CONFIDENTIAL

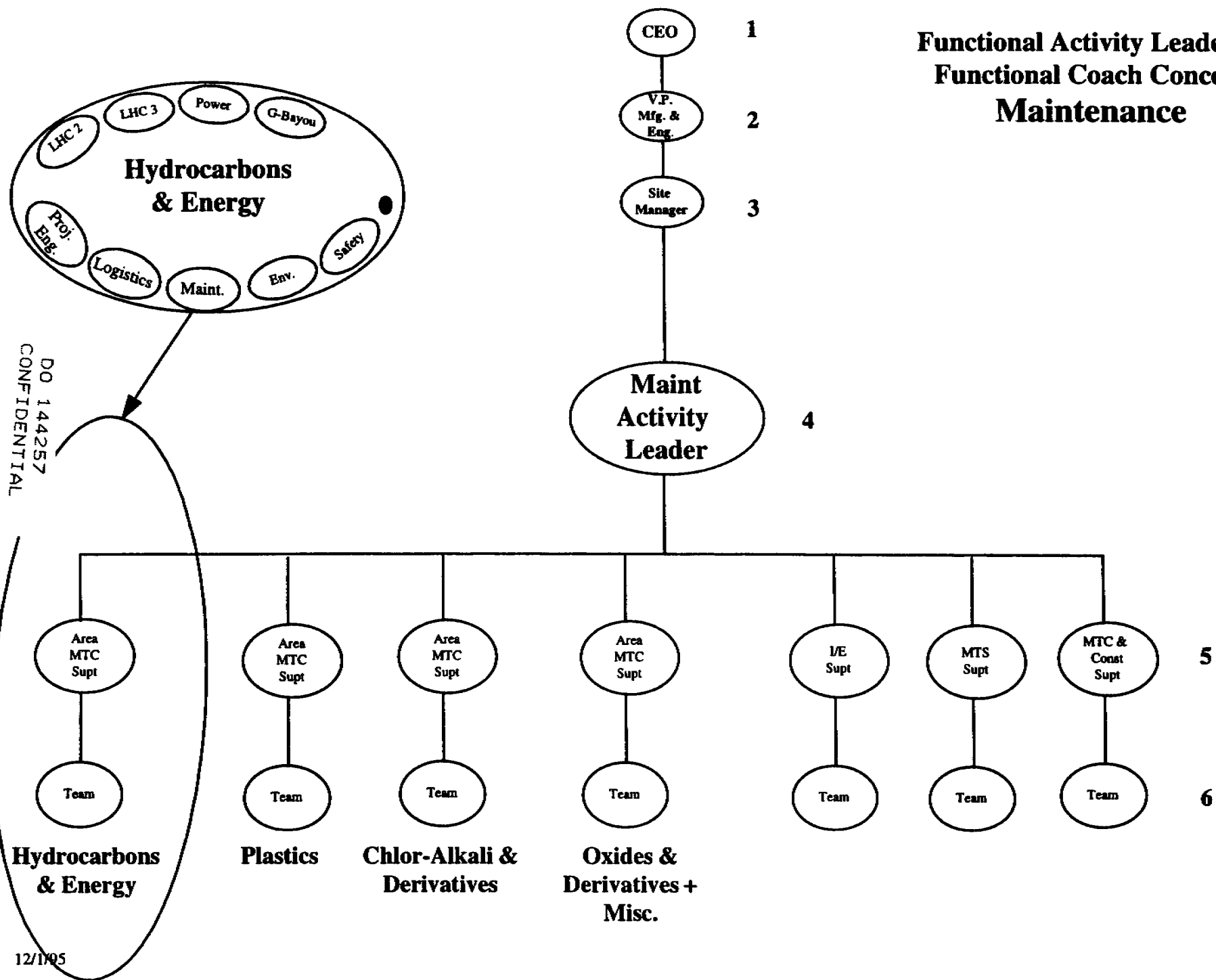


Functional Activity Leader & Functional Coach Concept Environmental

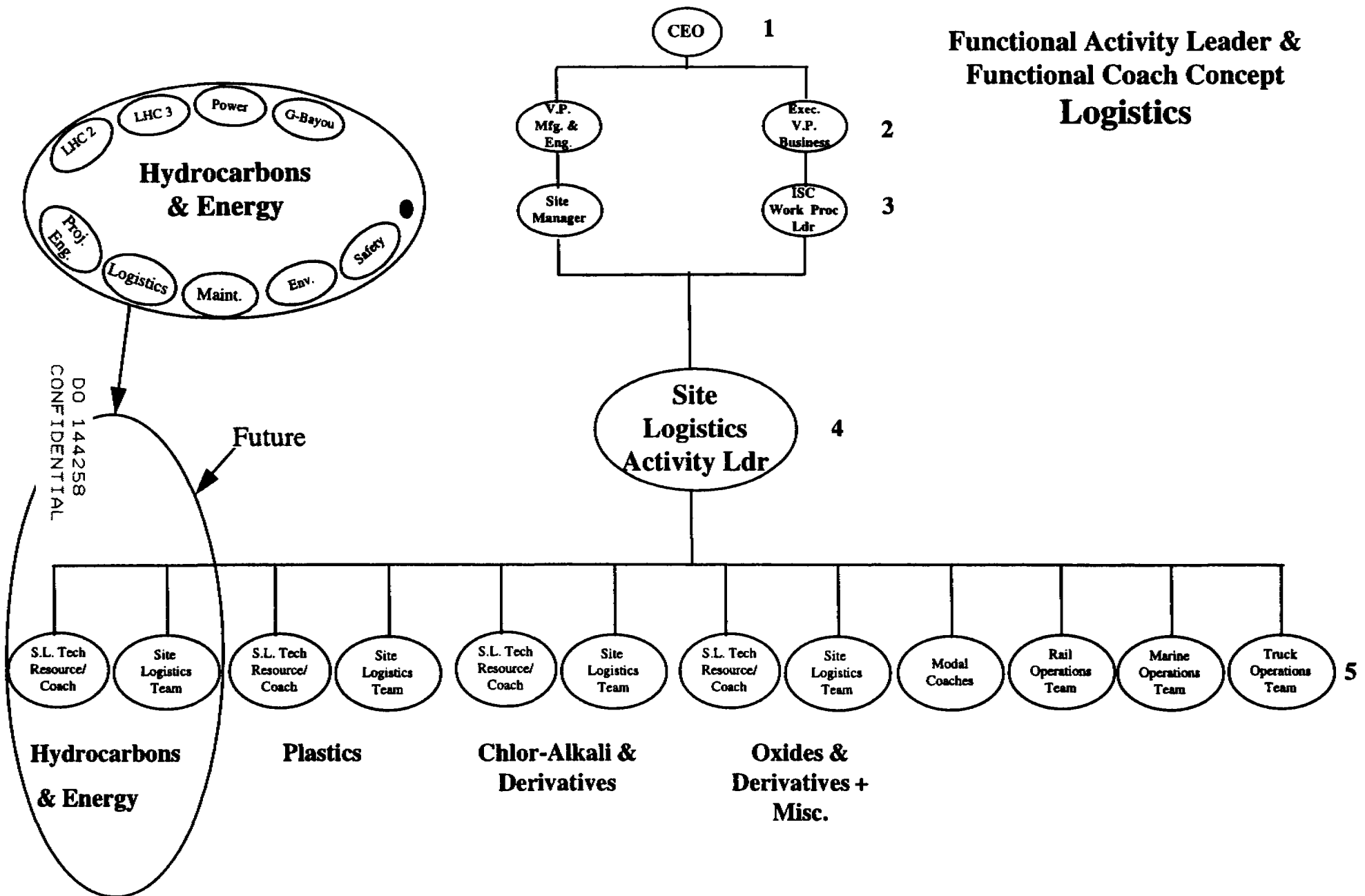


DO 144256
CONFIDENTIAL

Functional Activity Leader & Functional Coach Concept Maintenance

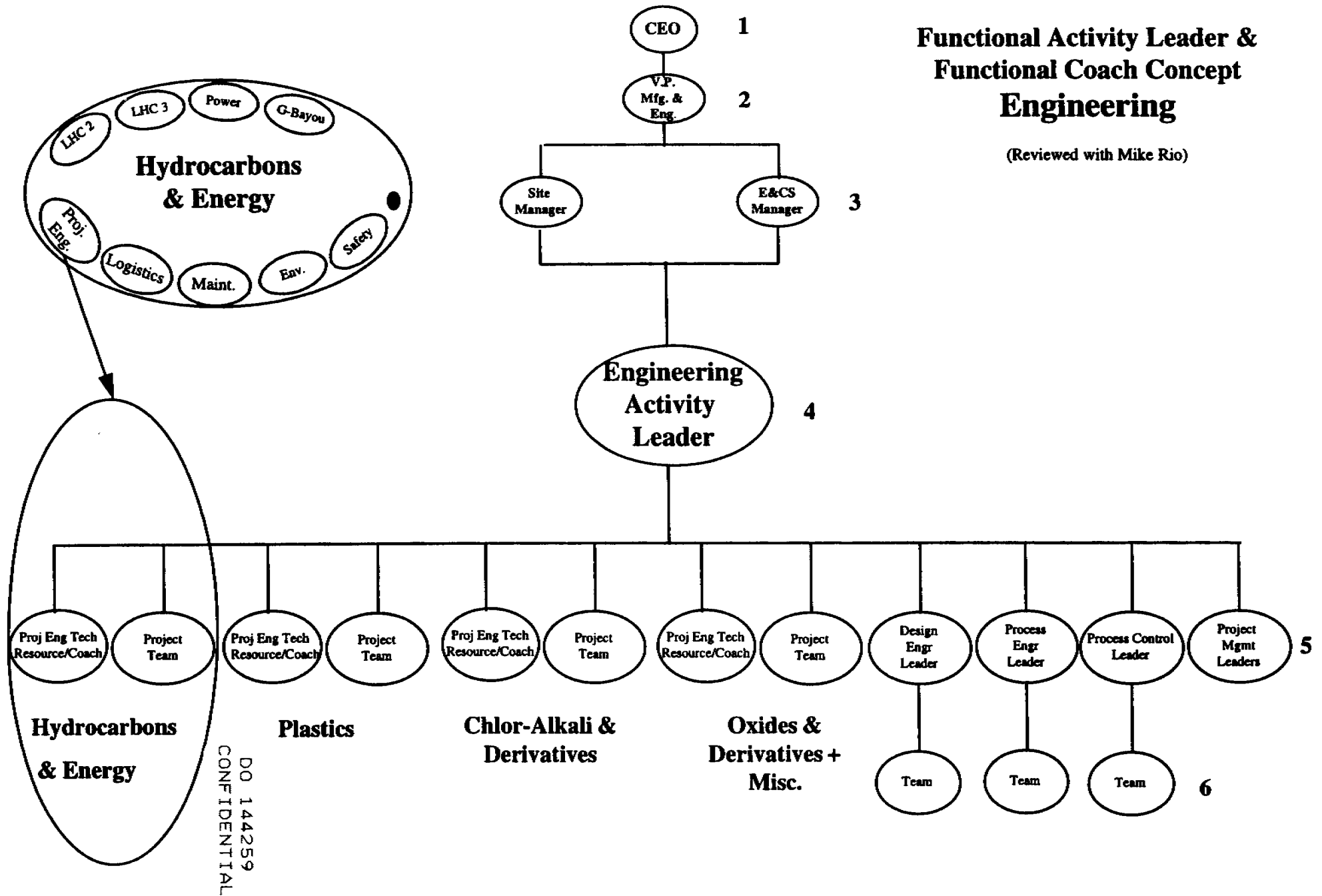


Functional Activity Leader & Functional Coach Concept Logistics



Functional Activity Leader & Functional Coach Concept Engineering

(Reviewed with Mike Rio)





Dow U.S.A.

The Dow Chemical Company
P.O. Box 150
Plaquemine, Louisiana 70765-0150

FACSIMILE COVER SHEET

TO:

Name Arnold Allemang

Company _____

Phone No. 517-636-4999 Fax No. 517-636-1254

Routine _____ Rush _____

Comments: _____

FROM:

Name Ken Hassenbeck

Phone No. 504-353-6471 Fax No. 504-353-8195

Date 12/1/95 Time 3:45 pm

Total Number of Pages 11

DO 144260
CONFIDENTIAL

YOU ARE NOTIFIED THAT THE INFORMATION CONTAINED IN THIS FACSIMILE TRANSMISSION IS COMMUNICATION INTENDED FOR THE USE OF THE INDIVIDUAL WHO IS NAMED ABOVE. IF YOU ARE NOT THE INTENDED RECIPIENT, OR AN EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERY TO THE INTENDED RECIPIENT, YOU ARE PROHIBITED FROM DISSEMINATING, DISTRIBUTING, OR COPYING THIS INFORMATION. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS SHOWN ABOVE BY THE U.S. MAIL AT OUR EXPENSE. THANK YOU

**EPA PROPOSED RULE
40 CFR PART 68**

**Risk Management Programs for
Chemical Accidental Release Prevention**

**George King
The Dow Chemical Company**

DATE: 6/7/95

TO:

W. C. Bernat, B-6650
S. G. Cole, B-4109
D. G. Fontaine, B-3301E
C. R. Holmes, B-3302P
T. E. Leigh, B-1601
J. W. Masey, B-3801
M. J. Sticklen, B-807

FROM: K. F. Hasenbeck
B-2306

DO 144261
CONFIDENTIAL

GMKing/reh
May 24, 1995
95-110a.ppt

**EPA RMP
Proposed Rule**

OUTLINE

Time Table

Overview of Proposal

Primary Concerns to Dow

Recommended Actions

DO 144262
CONFIDENTIAL

GMKing/reh
May 24, 1995
95-110b.ppt

**EPA RMP
Proposed Rule**

TIME TABLE

Proposed Rule Published in Federal Register	10/20/93
4 Public Hearings - Washington D.C.	11/93 - 1/94
Written Comments Submitted	02/16/94
Workshops Conducted	7/94 - 10/94
Supplemental Notice	03/13/95
Public Hearing	03/31/95
Written Comments Submitted	05/12/95
Workshops Conducted	??/??/95
Final Rule Published in Federal Register	03/96
Register Within 1 Year	03/97
All Plans Submitted Within 3 Years	03/99

GMKing/reh
May 24, 1995
95-110c.ppt

DO 144263
CONFIDENTIAL



EPA RMP Proposed Rule

OVERVIEW

*** STATUTORY AUTHORITY:**

Clean Air Act Amendments 1990

Section 112(r)

- 1) Purpose: To prevent the accidental release of listed substances and to minimize the consequences if any such release occurs.**
- 2) List of Substances with Threshold Quantities**
- 3) Risk Management Program for Chemical. Accidental Release Prevention.**

**GMKing/reh
May 24, 1995
95-110d1.ppt**

**DO 144264
CONFIDENTIAL**



EPA RMP Proposed Rule

OVERVIEW

*** List of Substances - Final January 15, 1994
128 Toxics and Flammables including these
common chemicals:**

**Chlorine
Anhydrous Ammonia
Methyl Chloride
Ethylene Oxide
Vinyl Chloride
Methyl Isocyanate
Hydrogen Cyanide
Hydrogen Sulfide
Toluene Diisocyanate
Phosgene
Bromine
Anhydrous Hydrogen Chloride
Hydrogen Fluoride
Anhydrous Sulfur Dioxide
Sulfur Trioxide**

**GMKing/reh
May 24, 1995
95-110d2.ppt**

**DO 144265
CONFIDENTIAL**



EPA RMP Proposed Rule

OVERVIEW

*** Requirements for Chemical Accident Prevention**

REGISTRATION

HAZARD ASSESSMENT

PREVENTION PROGRAM

Management System

Process Hazard Analysis

Process Safety Information

Standard Operating Procedures

Training

Maintenance

Pre-Startup Review

Management of Change

Safety Audits

Accident Investigation

Emergency Response Program

RISK MANAGEMENT PLAN

RECORD KEEPING

AUDITS

GMKing/reh
May 24, 1995
95-110d3.ppt

DO 144266
CONFIDENTIAL



RISK MANAGEMENT PLANS

CONTENTS

- ◆ **Copy of Registration Form**
- ◆ **For each regulated substance:**
 1. **Summary of the hazard assessment (including worst case)**
 2. **Analysis of off-site consequences (including worst case)**
 3. **Accident history data**
- ◆ **For the facility:**
 1. **Description of major hazards**
 2. **Description of consequences of failure to control hazard**
 3. **Summary of all actions taken to address these hazards**
 4. **How significant accidental releases are prevented or mitigated**

Above intended to provide overview of the prevention programs.

GMKing/r h
May 24, 1995
95-110e1.ppt

DO 144267
CONFIDENTIAL



RISK MANAGEMENT PLANS

CONTENTS continued

◆ Summary of Emergency Response Plan

- 1. Procedures to inform authorities**
- 2. Position of point of contact between the facility and public authorities**
- 3. Dates of drills and exercises completed and the results**
- 4. Description of coordination with the LEPC**

◆ Description of the Management System developed to implement and coordinate

- 1. The hazard assessment program**
- 2. Prevention program**
- 3. Emergency Response Program**
- 4. An organizational chart showing responsibility for risk management programs**

◆ Certification that information in RMP is true, accurate, and complete



RISK MANAGEMENT PLANS

✓ Submitted to:

- 1. Implementing Agency**
- 2. State Emergency Response Commission**
- 3. Local Emergency Planning Committee**

✓ Reviewed and Updated

At least every 5 years and resubmitted. Updated when new regulated substance is introduced or major change to facility.

✓ Made available to the public

DO 144269
CONFIDENTIAL

GMKing/reh
May 24, 1995
95-110F.ppt

DOW'S EPA RISK MANAGEMENT PLAN

WORK TEAM

Management Sponsor

Ken Hasenbeck

Team Leader

George King

N.A. Process S&LP

Members:

Art Mundt

Corporate Risk Assessment

David Gustafson

N.A. Environmental Quality

Tom Gibson

Corporate Process S&LP

Toby Threet

Env. Law Regulatory Group

Duane Barns

N.A. Safety

Susan Barrett

Env. Law Regulatory Group

Kevin Johnson

LGTI - Louisiana Division

Mission:

To identify the key issues effecting Dow and to take action to influence the proposed EPA Risk Management Plan Regulations.

Strategy:

To make the EPA Risk Management Plan requirements as much like the OSHA Process Safety Management requirements as possible.

DO 144270
CONFIDENTIAL

GMKing/reh
May 26, 1995
95-111.ppt

EPA RMP
Proposed Rule

DOW CONCERNS

- * Definition of Worst-Case Scenario (vessel failure)**
 - Hazard Assessment (look-up tables / modeling)**
 - Part of Risk Management Plan**
 - Communication to public**
 - More likely scenarios (CEI)**
- * Definition of Significant Accidental Release**
 - Goes beyond statutory requirements**
 - Human effects not plants and animals**
- * Risk Management Plans - Summaries**
- * Prevention Program should be OSHA PSM**

DO 144271
CONFIDENTIAL

GMKing/reh
May 24, 1995
95-110g1.ppt



EPA RMP Proposed Rule

DOW CONCERNS

- * Tiering of sources based on risk**
 - Tier I - no off-site impact from worst case release**
 - Tier II - minimal impacts, generic RMPs**
 - Tier III - full implementation**
- * VPP Recognition**
- * Accident Reporting - no new requirements**
- * Public Participation through the LEPC**
- * Technology Options Analysis (inherent safety)**
- * Linkage to Part 70 Air Permits**

DO 144272
CONFIDENTIAL

GMKing/reh
May 24, 1995
95-110g2.ppt



EPA RMP Proposed Rule

RECOMMENDED ACTION

*** EPA RMP Work Team will:**

- Work with CMA to eliminate OSHA / EPA duplication**
- Pilot risk communication to the public**
- Continue to monitor progress and communicate**

GMKing/reh
May 24, 1995
95-110h1.ppt

DO 144273
CONFIDENTIAL



EPA RMP Proposed Rule

RECOMMENDED ACTION

- * Support the implementation of the Process Risk Management Guidelines in your plants and with new capital project team.**
 - Update - F&EI and CEI**
 - Perform Consequence analysis triggered by F&EI and/or CEI**
 - Perform HAZOP on high potential risk areas of plants**
- * Communicate results of above to plant personnel and begin risk communication dialogue with employees.**
- * Wait for final rule.**

From: LACSDC::STICKLEN *MIKE STICKLEN-PLASTICS-LOUISIANA (504-353 8591)*
To: @KEN
CC:
Subj: Process safety workshop

REC'D JUN 05 1995

Ken, we are holding a process safety workshop for all technical folks and first-line supervisors on June 19. Our intent is to increase awareness and focus on Process Safety. I have asked each superintendent to lead an investigation for their work group on a case study of the Poly A decomp.

Mike

Mike S
Good approach
for
6/5/95

PLASTICS SAFETY PROCESSES CASE STUDY

SCOPE: Objective is to improve the knowledge of the current Safety Management Processes to prevent future serious incidents

PERCEPTIONS:

- 1) Currently the scope of many of the MOC's cover the immediate issue and do not adequately address unusual or unplanned events, e.g. infrequent shutdowns, emergencies, or maintenance.
- 2) MOC's do not adequately address operations outside of current defined process limits, failing to generate cautions or stops before a serious incident occurs.
- 3) Failure to recognize the possibility that changes which may result in incidents aren't being covered with the current safety systems.
- 4) Current knowledge and emphasis in reactive chemicals is not as good as it should be.

Using the March 19 Poly A Train 5 Decomp as a Case Study to illustrate issues that are present in the Louisiana Division, the group should determine how the current Safety Management Systems address these perceptions and how they could be modified to prevent reoccurrence.

Tentative Agenda

Monday June 19, 1995

12:30 -2:30 p.m.

New Hope/Reliance - Conference Center

- | | |
|---|--|
| A. Description of History, Incident and Events | 20 min - Bob Armstrong |
| B. Discussion of Safety Management Systems and how they could be used; MOC, Tech Center, Reactive Chem, Safety & Envir Sup't, LPP's, CHEG's | 20 min - Mark Mitchell |
| C. Divide into five sections, the group develops a plan to use the systems to prevent this type of incident | 35 min - Plt Supts to facilitate |
| D. Break | 5 min |
| E. Combined sections discuss recommendations and develop prioritized lists of strengths and changes needed in current systems | 30 min - Supts to present
DO 144275
CONFIDENTIAL |
| F. Agreed Summary and Action Plans from | 10 min - Mark Mitchell/ |

TO: DIVISION EXPANDED LEADERSHIP GROUP

SUBJECT: SAFETY PERFORMANCE

Our Dow employee safety performance has been great year-to-date. Many thanks for your very focused efforts and outstanding results!

The next area we are going for is a dramatic improvement in contractor safety on a site basis. We are trying for zero contractor injuries in June. I am asking each of you to support the Maintenance Teams' efforts in changing our contractor safety performance on a sustained basis. Please help reinforce the process we have set up for contractor safety and let's give it an extra boost in June.

Thanks for your help and remember--safety and environmental performance first, pounds second.

Ken Hasenbeck

jzs/6-2-95

DISTRIBUTION LIST:

LACSDC::U134470 ! {U134470} BERNAT, WILLIAM (WC), 504-389-8034
LACSDC::CHEW ! {U431404} CHEW JR, WOODY (WW), 504-389-6129
LACSDC::HANEY ! {U434403} HANEY, DOYLE (DA), 504-353-6128
LACSDC::HARICH ! {U431888} HARICH, PHILIP (PL), 504-389-8574
LACSDC::HENRY ! {U074923} HENRY, JIM (JE), 504-389-1509
LACSDC::HIEMENZ ! {U551472} HIEMENZ, JAMES (JJ), 504-389-1582
LACSDC::CJACKSON ! {U432798} JACKSON, CHARLES (CE), 504-353-6634
LACSDC::KJOHNSON ! {U138576} JOHNSON, KEVIN (KL), 504-353-5701
LAENV1::KALISH ! {U795015} KALISH, BOB (RL), 504-389-1618
LACSDC::MERCER ! {U433166} MERCER, CARL (CD), 504-389-6157
LACSDC::MODTLAND ! {U449981} MODTLAND, CURT (CD), 504-389-8515
LACSDC::PARKER ! {U434199} PARKER, STEVE (SM), 504-389-8679
LACSDC::ROBERTSON ! {U066134} ROBERTSON, ED (ED), 504-292-6591
LACSDC::SHIVELY ! {U060848} SHIVELY, JOHN (JW), 504-389-8045
LACSDC::SUIRE ! {U431342} SUIRE, ORAN (OJ), 504-353-8131
LACSDC::TURNER ! {U432981} TURNER, WAYNE (WA), 504-389-8491
LACSDC::BARRIOS ! {U430875} BARRIOS, CY (CA), 504-389-8654
LACSDC::BELLO ! {U431737} BELLO, GERALD (GA), 504-353-8111
LACSDC::BROOME ! {U434588} BROOME, JULIE (JA), 504-353-8653
LACSDC::BUCKLES ! {U434485} BUCKLES, CAREY (CA), 504-389-1740
LACSDC::RICHARDSON ! {U434455} HILL, LEIGH (VR), 504-353-1583
LAGTV1::U434166 ! {U434166} LEOPOLD, MICHAEL (MD), 504-389-8497
LACSDC::SAMPSON ! {U434495} SAMPSON, JOHN (JM), 504-389-8848
LACSDC::SLATER ! {U088395} SLATER, CATHRINE (CE), 504-353-1520
LARNDK::TOWNSEND ! {U433767} TOWNSEND, GLENDA P (GP), 504-353-1594

LACSDC::SGCOLE ! {U432871} COLE, STAN (SG), 504-353-6131
LACSDC::JADAMS ! {U433764} ADAMS, JEFF (JT), 504-389-1517
LACSDC::MILLS ! {U433954} MILLS, RONALD (RK), 504-389-6042
LACSDC::RMOORE ! {U432987} MOORE, ROBERT (RD), 504-389-8337
LACSDC::WROBERTS ! {U431349} ROBERTS JR, WOODY, JR. (WT), 504-389-8410
LACSDC::RTOUCHET ! {U432225} TOUCHET, RONALD (RS), 504-389-1519
LACSDC::CHAMBERS ! {U433134} CHAMBERS JR, ROBERT (RV), 504-353-6224
LACSDC::LDANIEL ! {U431711} DANIEL, LLOYD (LC), 504-353-8597
LACSDC::MACK ! {U434065} MACK, DEBBIE (DJ), 504-353-6234
LACSDC::JLANDRY ! {U434183} LANDRY, JIM (JD), 504-353-8022
LACSDC::CSMITH ! {U229932} SMITH, CARLTON (CL), 504-353-8565
LACSDC::USIE ! {U433481} USIE, PAM (PL), 504-353-8049

DO 144276
CONFIDENTIAL

DOWMAIL::U430845 ! {U430845} DAIGRE, GERRY (GW), 504-389-1602
LACSDC::U431557 ! {U431557} BABIN, BABS (BB), 504-353-8232

LACSDC::U239297 ! {U239297} BARONE JR, GUY (GS), 504-353-8236
LACSDC::U085950 ! {U085950} CAMBRE, GARY (GJ), 504-353-8265

LACSDC::FONTAINE ! {U432375} FONTAINE, DWIGHT (DG), 504-389-8330
LACSDC::BEARD ! {U434163} BEARD, ROBIN (RN), 504-353-6582
LACSDC::BROOKINS ! {U434459} BROOKINS, TOM (TM), 504-353-6441
LACSDC::COX ! {U432410} COX, WAYNE (WE), 504-353-8137
LACSDC::DAQUIN ! {U434421} D'AQUIN, DANE (DT), 504-353-8289
LACSDC::HENDRY ! {U432744} HENDRY, RON (RL), 504-353-1559
LACSDC::HOOVER ! {U229584} HOOVER JR, BILL (WL), 504-353-2362
LACSDC::LAFITTE ! {U433162} LAFITTE, LARRY (LL), 504-353-8985
LACSDC::MONROE ! {U431030} MONROE, JOHN (JC), 504-353-8169
LACSDC::ROUX ! {U432280} ROUX, PAUL (PE), 504-389-8153
LACSDC::MWOODS ! {U433490} WOODS, MIKE (ML), 504-353-8024

DOWMAIL::U074699 ! {U074699} GRAY, JOHN (JA), 504-389-8226

LACSDC::HOLMES ! {U432287} HOLMES, CATHY (CR), 504-353-5854
LACSDC::ABOURG ! {U430821} BOURG, ART (AJ), 504-389-8719
LACSDC::BULLMAN ! {U432984} BULLMAN JR, ARNOLD (A), 504-389-6109
DOWMAIL::U433787 ! {U433787} FISCHER, TED (TW), 504-389-8656
LACSDC::HOWARD ! {U431947} HOWARD, FLASH (THOMAS) (TC), 504-389-8965
DOWMAIL::U431091 ! {U431091} MARIONNEAUX, EUGENE (EN), 504-389-8074
LACSDC::MESSELT ! {U433023} MESSELT, CHRIS (CD), 504-389-2491
LACSDC::SANDS ! {U433296} SANDS, TOM (CT), 504-389-8326
LACSDC::SERPAS ! {U434419} SERPAS, STEWART (SL), 504-353-8487
LACSDC::U431337 ! {U431337} ALMOND, CHARLES (CE), 504-353-8392
LACSDC::BELVIN ! {U432606} BELVIN, MARGARET (MC), 504-353-1808
LACSDC::BUTLER ! {U241658} BUTLER, JOE (JM), 504-353-6509
LACSDC::CARVILLE ! {U432273} CARVILLE, DONNA (DB), 504-353-1824
LACSDC::CAUSEY ! {U432483} CAUSEY, HELEN (HL), 504-353-8044
LACSDC::HEASLIP ! {U431285} HEASLIP, JIM (JP), 504-353-8475
DOWMAIL::U431113 ! {U431113} HERBERT JR, BILL (CW), 504-353-8587
DOWMAIL::U432787 ! {U432787} HUSSER, RONNIE (RW), 504-353-1537
LACSDC::DJONES ! {U433818} JONES, DON (DS), 504-353-6097
DOWMAIL::U430940 ! {U430940} LATIMER, RICHARD (RO), 504-353-8317
LACSDC::ALOTT ! {U431307} LOTT, AL (MA), 504-353-8384
DOWMAIL::U433273 ! {U433273} POSTON, PERRY (PL), 504-353-8310

LARNDG::HORTON ! {U431366} HORTON JR, BOYD (WB), 504-389-1605
LARNDG::AINSWORTH ! {U431087} AINSWORTH JR, OLIVER C (OC), 504-389-1620
LARNDG::BOWLINRL ! {U431368} BOWLIN, ROGER L (RL), 504-389-1608
LARNDG::GROSS ! {U432154} GROSS, JOHN W. (JW), 504-389-1715
LARNDG::STEVENS ! {U137964} STEVENS, JOHN (JW), 504-389-1661
LARNDG::WEEKS ! {U431822} WEEKS, THOMAS C. (TC), 504-389-1638
LARNDG::WESTJM ! {U431854} WEST III, JOHN (JM), 504-389-1643
LARNDG::GREGORY ! {U076474} GREGORY, STEVE (SD), 504-353-1823
LARNDG::HOLBROOK ! {U433060} HOLBROOK, MICHAEL T (MT), 504-353-1839
LARNDG::PRIERDG ! {U433111} PRIER, DONALD (DG), 504-353-1663
LARNDG::POPE ! {U432656} POPE, BRIAN (BG), 504-353-1636
LARNDG::CORAM ! {U434126} CORAM, PAUL (PT), 504-353-6486
LARNDG::TOTH ! {U077787} TOTH, CHERI (CA), 504-353-8288
LARNDG::WEST ! {U434327} WEST, DAVID (DH), 504-353-1786
LARNDG::HEBERTLA ! {U434641} HEBERT, LARRY (LA), 504-353-1849
LARNDG::GRIGSBY ! {U088047} GRIGSBY, DEAN (HD), 504-353-1868

DO 144277
CONFIDENTIAL

LACSDC::U912532 ! {U912532} LEIGH, TERRY (TE), 504-353-8913
LACSDC::SCOLE ! {U434352} COLE, SHARON (SR), 504-353-6132
LACSDC::DDUPUY ! {U434375} DUPUY, DAVID (DW), 504-353-6365
LACSDC::GUNN ! {U433073} GUNN, TIM (TM), 504-389-1514
LACSDC::GLEBLANC ! {U434307} LEBLANC, GRETCHEN (GC), 504-353-1642

LACSDC::MULLER ! {U431855} MULLER, JOE (JJ), 504-389-8165
 LACSDC::OUBRE ! {U132118} OUBRE, MAURICE (M), 504-389-8953
 LACSDC::DTAYLOR ! {U434501} TAYLOR, DON (DW), 504-353-5855
 LACSDC::U432991 ! {U432991} THORNHILL, RICK (RD), 504-382-4555
 LACSDC::CONLEY ! {U434090} CONLEY III, LEN (LN), 504-389-8404
 LACSDC::HEINS ! {U086047} HEINS JR, MONTY (EM), 504-353-6375
 LACSDC::KUHLMETIER ! {U069866} KUHLMETIER, RAY (RJ), 504-353-8478
 LACSDC::MCMURRAY ! {U434483} MCMURRAY, VIC (VE), 504-389-6148
 LACSDC::MILES ! {U433957} MILES, BRUCE (BE), 504-389-8613
 LACSDC::MYER ! {U140837} MYER, EDIE (EJ), 504-353-6495
 LACSDC::TNORMAND ! {U434515} NORMAND, TOM (TM), 504-389-1652
 LARNDG::PEEBLES ! {U432195} PEEBLES, RODDEY (RL), 504-353-1766
 LARNDG::PITTMAN ! {U433718} PITTMAN, EDWARD F (EF), 504-389-1853
 LACSDC::SANDOW ! {U434343} SANDOW, ALLAN (AD), 504-353-8887
 LACSDC::SMITH ! {U434185} SMITH, STEVE (SA), 504-389-6242
 LACSDC::SCHULTZ ! {U434391} SCHULTZ, GREG (GK), 504-353-8403
 LACSDC::WHITE ! {U434499} WHITE, SCOTT (WS), 504-389-6041

DOWMAIL::U431842 ! {U431842} LOPEZ, RON (RA), 504-353-8369

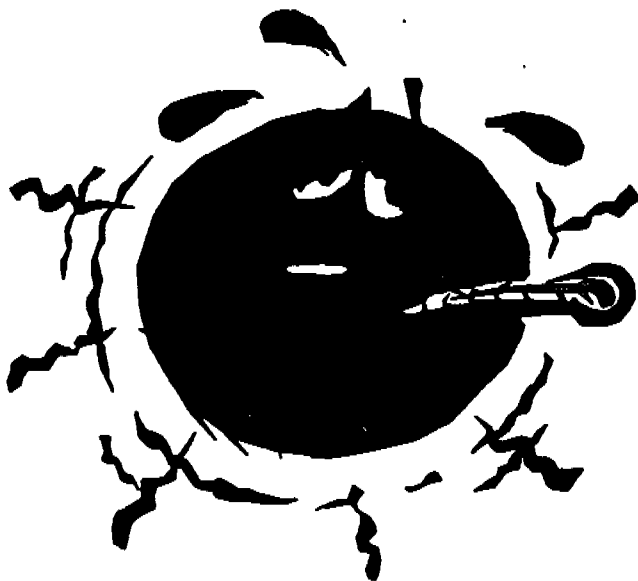
LACSDC::MASEY ! {U432948} MASEY, JOHNNY (JW), 504-389-1549
 LACSDC::SALLEN ! {U065063} ALLEN, SAM (SH), 504-389-8790
 LACSDC::GRISSOM ! {U432258} GRISSOM, NICKIE (NL), 504-389-6588
 LACSDC::U431581 ! {U431581} HUDSON, ROGER (RD), 504-353-1506
 LACSDC::BJACKSON ! {U433200} JACKSON JR, BILL (WL), 504-389-1884
 LACSDC::MIMS ! {U434092} MIMS, STEVE (SH), 504-353-5795
 LACSDC::RUSHING ! {U434422} RUSHING, LARRY (LP), 504-336-5360
 LACSDC::COOPER ! {U434519} COOPER, TIM (WT), 504-389-1812
 LARNDG::KLAWITTER ! {U033137} KLAWITTER, CHUCK (CL), 504-353-6166
 LACSDC::LYLE ! {U434496} LYLE, DONALD (DR), 504-389-6472
 LACSDC::MARTIN ! {U434432} MARTIN, HAROLD B. (HB), 504-353-1546
 LACSDC::MILLIGAN ! {U434435} MILLIGAN, STEVE (WS), 504-389-8100
 LACSDC::RAWLINGS ! {U433994} RAWLINGS III, JOE (JE), 504-389-1708
 LACSDC::TJROZAS ! {U434428} ROZAS, TOMMY (TJ), 504-389-6418
 LACSDC::ESUPPLE ! {U431211} SUPPLE JR, EDDIE (ET), 504-353-5722
 LACSDC::KTAYLOR ! {U434328} TAYLOR, KEVIN (KD), 504-389-8696
 LACSDC::U075196 ! {U075196} HANRAHAN, LYNNE (LA), 504-353-6089
 LACSDC::WITTMANN ! {U431826} WITTMANN, RICK (RW), 504-353-6863
 LACSDC::ZAGONE ! {U434460} ZAGONE, JEFF (JP), 504-353-1598
 LACSDC::JRWATKINS ! {U434598} WATKINS, JAMES (JR), 504-353-6726
 LACSDC::CENKUS ! {U434197} CENKUS, MARK (MA), 504-353-8151
 LACSDC::SHARKEY ! {U432797} SHARKEY, WILLIAM (WT), 504-353-6127

LACSDC::STICKLEN ! {U738537} STICKLEN, MIKE (MJ), 504-353-8591
 LACSDC::DIAMOND ! {U431816} DIAMOND, KEN (KD), 504-389-6023
 LACSDC::FITZGERALD ! {U434168} FITZGERALD, RONNIE (RS), 504-353-6521
 LACSDC::SPEED ! {U136431} SPEED, DICK (RB), 504-389-8503
 LACSDC::U432834 ! {U432834} GRANT, TONY (TF), 504-389-8646
 LARNDG::AKERS ! {U433735} AKERS, JAMES (JB), 504-353-6259
 LACSDC::ARMSTRONG ! {U431834} ARMSTRONG, BOB (RD), 504-353-8560
 LACSDC::BRADLEY ! {U434054} BRADLEY, TOM (TC), 504-353-6004
 LACSDC::BUCHOLTZ ! {U434632} BUCHOLTZ, DAN (DR), 504-389-6451
 LACSDC::CBCARPENTER ! {U431750} CARPENTER, CHARLES (CB), 504-353-6165
 LARNDG::MITCHELL ! {U432898} MITCHELL, MARK (MT), 504-353-1869
 LACSDC::U089714 ! {U089714} PETERS, MARK (ME), 504-353-4790
 LACSDC::TERHOEVE ! {U434510} TERHOEVE, ANA (AS), 504-353-8744
 LACSDC::YOUNG ! {U434553} YOUNG, MIKE (MR), 504-353-8948

LACSDC::U033191 ! {U033191} UHLMANN, LESTER (LJ), 504-389-8211
 LACSDC::BURTT ! {U432118} BURTT, JAN (JL), 504-389-8251
 LACSDC::MEYER ! {U434622} MEYER, DOUGLAS (DP), 504-353-6767

LACSDC::U134594 ! {U134594} HASENBECK, KEN (KF), 504-353-6471

DO 144278
 CONFIDENTIAL



SAFE BEHAVIORS FOR SUMMER

HEAT HAZARDS

★ PHYSICAL PROBLEMS

- Slippery hands
- Fogged monogoggles
- Sweat in eyes

★ BEHAVIORAL PROBLEMS

- Impatience
- Hurrying
- Short cuts
- Inattention

★ MEDICAL PROBLEMS

- Heat cramps
- Heat exhaustion
- Heat stroke

SAFE BEHAVIORS

EXAMPLES:

Carry spare gloves
Carry clean rag to dry eye protection

EXAMPLES:

Plan work
Set appropriate work pace

EXAMPLES:

Take breaks
Drink fluids
Respond to warning signs
Limit time in slicker/ acid suits

DO 144279
CONFIDENTIAL

SAFETY & ENVIRONMENTAL PERFORMANCE FIRST -- POUNDS SECOND

copy, print, then -

Good approach

Thanks!

Her 5/19/95



SAFE BEHAVIORS FOR SUMMER

*- Voice Mail Production
Manager - please support
or distribute to leadership group*

To: Dow and Contract Supervision

CONCERN:

- * **Rash of injuries last two weeks**
- * **Very hot weather earlier than usual**
- * **One case of Heat Exhaustion**

ACTION REQUESTED:

- ☛ **Lead a 15 minute tailgate meeting with your work group on Tuesday, May 23.**
- ☛ **Discuss the heat hazards listed on reverse side and engage your work group in identifying safe behaviors to address these hazards**

DO 144280
CONFIDENTIAL

SAFETY & ENVIRONMENTAL PERFORMANCE FIRST - POUNDS SECOND

DBST
F.Y.I.
Ken
4 Christm

CHEMICAL MANUFACTURERS ASSOCIATION
Member Firm Incidence Rates per 200,000 Exposure Hours
Year to Date through 12/31/94
Group Size 3: More than 20,000,000 Exposure Hours per year

Company	Total Recordable Case Rate		Deaths & Total Lost Workday Case Rate		Deaths & Total Lost Workday Cases Away from Work Rate		Total Exposure Hours in thousands	
	1994	1993	1994	1993	1994	1993	1994	1993
DuPont Company	0.95	0.71	0.39	0.25	0.06	0.05	119383.	128596.
Merck & Co., Inc.	1.26	1.08	0.43	0.47	0.28	0.28	42537.	41629.
Occidental Chemical	1.55	2.02	0.71	1.10	0.31	0.44	25639.	27418.
Monsanto	1.67	1.62	0.54	0.57	0.36	0.42	32041.	33621.
Air Products &	1.72	1.85	0.82	0.67	0.21	0.19	22341.	22836.
Hoechst Celanese Corp.	1.95	2.57	0.96	1.28	0.35	0.56	44277.	46259.
Miles, Inc.	2.35	2.48	1.16	1.30	0.81	0.97	44928.	47079.
Dow Chemical Co.	2.42	2.49	1.09	0.99	0.49	0.40	42946.	45869.
BASF Corporation	2.54	2.52	1.07	1.27	0.52	0.58	30426.	33515.
Amoco Chemical Corp.	2.95	4.44	1.53	2.34	0.19	0.43	26221.	29186.
Eastman Chemical	4.22	5.21	1.84	1.88	0.25	0.11	30598.	31570.
Eli Lilly and Company	5.49	7.28	2.95	4.54	0.87	0.49	27694.	6954.
Union Carbide Corp.	6.81	5.57	3.61	2.71	1.11	0.75	22114.	22950.
Group averages	2.31	2.22	1.08	0.99	0.38	0.37		

Number of companies reporting, 1994: 13
 Number of companies reporting, 1993: 12

***** indicates no prior year data submitted

DATE:

TO:

W. C. Bernat, B-6650
 S. G. Col, B-4109
 D. G. Fontaine, B-3301E
 C. R. Holmes, B-3302P
 T. E. Leigh, B-1601
 J. W. Masey, B-3801
 M. J. Sticklen, B-807
 C. D. Meseritt, 2502W

FROM: K. F. Hasenbeck
 B-2306

DO 144281
 CONFIDENTIAL

03/02/95

Page

1

REC'D MAY 08 1995



The Dow Chemical Company
Midland, Michigan 48674

2020 BUILDING
May 2, 1995

RESTRICTED FOR USE WITHIN DOW
AND DOW SUBSIDIARIES

DATE: 5/8/95

TO:
W. C. Bernat, B-6650
S. G. Cole, B-4109
D. G. Fontain, B-3301E
C. R. Holmes, B-3302P
T. E. Leigh, B-1601
J. W. Masey, B-3801
M. J. Sticklen, B-807

FROM: K. F. Hasenbeck
B-2306

TO: A. A. Allemang, Mfg, Horgen
J. G. Barksdale, Plastics & Nitro Prod, Freeport/APB
T. J. Block, Continental Operations, DOC
D. B. Cattran, Mgmt, Fort Saskatchewan/201A
R. M. Croyle, Dow Environmental, 2040
K. R. Davis, N.A. Operations, 2020
G. S. Dickson, N.A. Operations - Safety, 2020
K. F. Hasenbeck, Div Admin, Plaquemine/2306
J. B. Martin, Corp Env, 2030
E. L. Rainwater, Oper Admin, Freeport/APB
E. V. Reed, N.A. Operations - H.R., 2020
J. M. Rio, E&CS Admin, Houston Dow Center
J. T. Smolarek, Management, Sarnia/21
G. R. Veurink, Asset Utilization Resources, Freeport/APB
J. A. Weymouth, Div Admin, 47/MI
L. E. Wretlind, Chem/Hydrocarbons/Energy, Freeport/B-101
L. F. Wright, Corp Mfg & Eng, 2030

Attached are the "Safe Behaviors" for each level of supervision in Louisiana Division. It is an excellent approach to clearly defining the actions required of each supervisor to make a significant impact on safety.

This is one of the approaches that Louisiana Division has used to improve safety performance. I liked the idea so well that I have written up "Safe Behaviors" for my own action (copy attached). I intend to work hard on these actions, and you should hold me accountable if I'm not giving them the proper priority.


Bob Gallant
N.A. Operations

Attachments

DO 144282
CONFIDENTIAL

*Copy
DPS
You should really
feel good about
what you have done.
on Safety - You have helped
set the competitive standard*

SAFE BEHAVIORS
FOR VICE PRESIDENT, NORTH AMERICA OPERATIONS

- Discuss/get feedback on safety on every site/plant visit.
- Include safety in all "State of the Business" speeches, satellite broadcasts, etc.
- Routinely call site managers to discuss current safety performance and activities.
- Set safety expectations, communicate progress, and aggressively push actions to achieve targets.
- Report on safety highlights at each North America Operating Board meeting.
- Send personal congratulations to sites/plants that achieve outstanding safety performance.
- Reinforce "Safe Behaviors" of direct reports; use negative feedback to address unsafe behaviors.
- Encourage Business Vice Presidents to include safety in their communications with sites/businesses.
- Regularly review tabulation of safety performance by Operations Leader, Site Process and/or Manufacturing Leader, Business and Technology.

"SAFE BEHAVIORS"

FOR GENERAL MANAGER

- **Make it a point to discuss/get feedback on safety on every plant/department visit.**

Reinforce "Safe Behaviors" of direct reports; use negative feedback to address unsafe behaviors.

Ensure safety measures are routinely reviewed by DRST.

Have Manager review any OSHA/serious incident in their area at Sunrise.

Ensure that any OSHA/serious incident is communicated within one working day.

- **Ensure safety is part of every agenda for high level visitors.**

Include safety in all Division "State of the Business" reports.

Recognize site safety achievements/highlights.

- **Set safety expectations and ensure progress.**

Participate in some safety audits.

Begin/end meetings with a safety message.

"SAFE BEHAVIORS"

FOR MANAGERS

- **Make observing for safety and intervening an integral part of every trip into the plant; it must take priority over checking for quality, productivity and/or cost.**
- **Reinforce "Safe Behaviors" of direct reports.**
- **Begin/end meetings with a safety message.**
- **Meet with Superintendents/Department Heads to formally review any OSHA/serious incidents.**
- **Devote time at staff meetings for each Superintendent to review progress/ideas on safety improvement.**
- **Seek feedback from all levels in the organization on how safety improvement is being managed (Methods: written feedback, listening sessions, one-on-one's).**
- **Monitor key safety performance indicators.**
- **Attend some OSHA investigations.**

"SAFE BEHAVIORS"

FOR PLANT SUPERINTENDENTS

Make observing for safety and intervening an integral part of every trip into the plant; it must take priority over checking for quality, productivity and/or cost.

Have periodic discussions with Production Supervisor about appropriate actions at all levels.

Seek input from Operators on how their supervisor is managing improvement (Methods: written feedback, listening sessions, one-on-one's).

- **Initiate initial and follow-up meetings with First Line Supervisors, Production Supervisor for consistent message in setting expectations and consequences.**

Meet with people exhibiting behavioral problems to ensure clear understanding of present/future consequences.

Begin/end meeting with a safety message.

- **When appropriate, insure communication of the root cause of Division OSHA's for learning value.**
- **Champion accountability -- root cause in investigations normally points to behavior -- acknowledge who is accountable in the investigation (accountability in public, discipline in private).**
- **Insure follow-up actions/consequences are based on root cause.**
- **Reinforce "Safe Behaviors" of direct reports.**

DO 144286
CONFIDENTIAL

"SAFE BEHAVIORS"

FOR PLANT STAFF

- **Make observing for safety and intervening an integral part of every trip into the plant; it must take priority over checking for quality, productivity and/or cost.**
- **Discuss any observations with Production Supervisor.**
- **Discuss contractor observations with contractor foreman/supervisor, both positive and negative.**
- **Lead operator safety meetings, project reviews, etc. relative to potential safety problems on your projects.**
- **Personally set an excellent example -- follow S&LPs, use the required PPE, follow procedures, etc.**

Initiate use of MOC and ensure it is rigorously applied.

Make safety a part of job requests to operators to insure routine affirmation of the "Safety First, Pounds Second" message.

"SAFE BEHAVIORS"

FOR PRODUCTION SUPERVISORS

- **Make observing for safety and intervening an integral part of every trip into the plant; it must take priority over checking for quality, productivity and/or cost.**
- **Reinforce "Safe Behaviors" of direct reports; use negative feedback to address unsafe behaviors.**
- **Have periodic, short, one-on-one discussions with First Line Supervisors to clarify expectations and review supervisor's progress in spending time observing for safety, using positive and negative reinforcement, etc.**

Follow up with First Line Supervisors on consequences planned as a result of root cause identification after an incident.

- **Talk with First Line Supervisors regarding C-9, Red Tag, Safe Work Permit compliance; discuss planned actions to improve.**

Participate with First Line Supervisors in talking with individuals about present/future consequences due to individual's inappropriate behavior.

Train plant staff on safety observations and initiate follow-up discussions on progress.

Champion accountability -- root cause in investigations normally points to behavior -- acknowledge who is accountable in the investigation (accountability in public, discipline in private).

"SAFE BEHAVIORS"

FOR FIRST LINE SUPERVISORS

- **Make observing for safety and intervening an integral part of every trip into the plant; it must take priority over checking for quality, productivity and/or costs.**

Schedule time to observe direct reports performing work.

- **Schedule time to observe contractors performing work.**
- **Routinely reinforce safe behaviors with positive feedback.**
- **When needed, use negative feedback to address unsafe behaviors. Train and remind operators to plan for safety before beginning a job; specifically, safe job procedure is understood, the right PPE is provided, potential body position hazard considered, etc.**

Initiate tailgate meetings to discuss safety.

Schedule short, occasional meetings with other department supervisors to share techniques, etc.

Clearly demonstrate "Safety First, Pounds Second" by routinely making personal safe behaviors a priority.

From: MARN01::MARN01::MRGATE::"MRGATE::U085885" 25-APR-1995 09:24:02.26
To: U134594
CC:
Subj: CONGRATULATIONS!

From: NAME: U085885 <U085885@MRGATE@MARN01>
To: U134594@MRGATE

Distrib:S08VRNA_U085885_0001 25-APR-1995 10:13
Name: 95115CID1800
Comment:CONGRATULATIONS!
<FF>

To: U134594 --MADECD HASENBECK, KEN K F
cc: U068213 --S08VRNA SUDERMAN, JUDITH J U700908 --S08VRNA SOSA, E J. / 2020
U069835 --S08VRNA DICKSON, GREG S. /

From: MICHELLE RAJEWSKI, ISSUES MANAGEMENT, 2020 DOW CENTER, 6-9433
SUBJECT: CONGRATULATIONS!

Ken,

Congratulations to Louisiana Division for achieving 2 million manhours without a DAW. This is a very important achievement and continues the outstanding safety performance in 1995. I also hear that you have now gone over 1 month without a contractor OSHA.

Louisiana Division is setting the standard for safety leadership in Dow North America. Thanks to all the people who are making it happen.

Bob Gallant

DO 144290
CONFIDENTIAL



*Copy
DRST
Hem*

RECD APR 26 1995

2020 BUILDING
April 21, 1995

The Dow Chemical Company
Midland, Michigan 48674

RESTRICTED FOR USE WITHIN DOW
AND DOW SUBSIDIARIES

DATE: 4/28/95

TO:
W. C. B mat, B-6650
S. G. Cole, B-4109
D. G. Fontaine, B-3301E
C. R. Holmes, B-3302P
T. E. Leigh, B-1601
J. W. Masey, B-3801
M. J. Sticklen, B-807

FROM: K. F. Hasenbeck
B-2306

TO: J. G. Barksdale, Plastics & Nitro Prod, Freeport/APB
T. J. Block, Continental Operations, DOC
D. B. Cattran, Mgmt, Fort Saskatchewan
K. F. Hasenbeck, Div Admin, Plaquemine/2306
E. L. Rainwater, Oper Admin, Freeport/APB
J. M. Rio, E&CS Admin, Houston Dow Center
J. T. Smolarek, Management, Sarnia/21
G. R. Veurink, Asset Utilization Resources, Freeport/APB
J. A. Weymouth, Div Admin, 47/MI
L. E. Wretlind, Chem/Hydrocarbons/Energy, Freeport/B-101

cc: G. S. Dickson, N.A. Operations - Safety, 2020 (letter only)
G. C. Phillips, Corp Safety/LP/Security, 2020 (letter only)

Attached is the Reactive Chemicals Assessment done by a team led by Gary Phillips. There are some very key messages in this perspective on where we are and what we must do to improve. Please distribute this to your appropriate people and see that it receives the necessary priority. Our Reactive Chemical Incidents performance is not acceptable.

Bob Gallant
Bob Gallant
N.A. Operations

Attachment

DO 144291
CONFIDENTIAL



2020 Dow Center
April 19, 1995

The Dow Chemical Company
Midland, Michigan 48674

RESTRICTED FOR USE WITHIN DOW

A. A. Allemang, Horgen
R. W. Gallant, 2020 Dow Center

M. R. Gambrell, Sao Paulo
A. J. McKirdy, Hong Kong

cc: G. S. Dickson, 2020 Dow Center
L. F. Wright, 2030 Dow Center

W. R. Knee, 2030 Dow Center
M. N. Trask, 2030 Dow Center

REACTIVE CHEMICALS ASSESSMENT

The initial evaluation of the Reactive Chemicals status within the company has been completed per your request. A list of recommendations and issues have been developed that I want to communicate to you. These recommendations support the existing reactive chemicals process that has been successful for us. The recommendations as structured should not add work to an already busy organization. For the most part these recommendations address emphasis, focus and attention to discipline in areas that should already be part of the existing work process. Even though, overall, we may have plateaued in the area of Reactive Chemicals performance, we do not need to reengineer. There are a number of areas where significant improvements in efficiency and productivity can be implemented. Several have been identified and are included in the recommendations.

Essentially, all of the recent reactive chemicals incidents have involved "known chemistry" - known by the technical community but not necessarily known by the individuals involved in the actual work. This assessment has, thus, focused on the way we apply known technology and learning relative to reactive chemicals. The first part of the assessment involved Bill Knee and me reviewing our Technology Center reactive chemicals process and activities with ten of our "highest profile" technology centers. This was followed by informal visits with 23 plants in Europe and North America to review Operating Discipline and other practices involving reactive chemicals. This was an excellent format to discuss opportunities and heighten awareness with a number of plant operations people. In addition, six reactive chemicals consolidated audits and 11 new Superintendent reactive chemicals reviews were attended in order to help develop an overall evaluation and definition of the key drivers for reactive chemicals and process safety. This along with reviewing the root causes of some recent reactive chemicals incidents was the basis for the attached model for reactive chemicals and process safety. This model defines five key drivers or areas of emphasis for our plant operations. Deficiencies in any one of these five areas can result in a safety problem in the future. It may be noted that these key elements also drive efficient plant operation. I think this fits with your views relative to the relationship between plant safety performance to overall plant performance.

DO 144292
CONFIDENTIAL

Area Manufacturing VPs
REACTIVE CHEMICALS ASSESSMENT

Page 2

April 19, 1995

The other actionable issues are listed and attached with a suggestion of who should be responsible. I think most are self-explanatory; but I would like to spend some time in the future with you to clarify, answer questions and get your input.

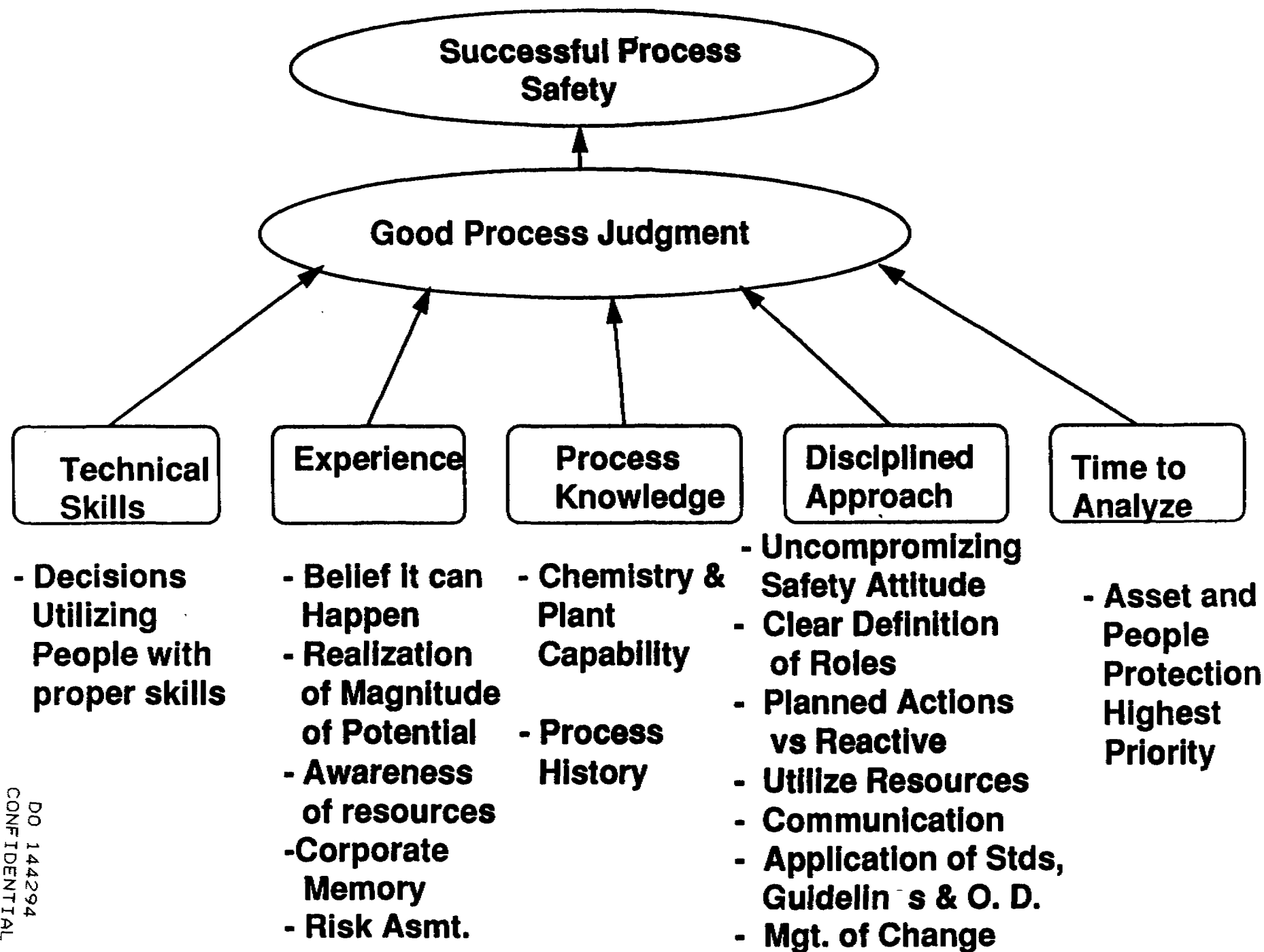
The plan is to continue the assessment by visiting the other areas and sites, as well as work on the implementation of the attached recommendations. I look at part of my ongoing role as heightening awareness, defining opportunities and facilitating consistency with our reactive chemicals efforts. The plant visits seem to be a good way to accomplish this. If you think this effort needs a different emphasis, please let me know. Thanks for the opportunity to interact with the people and plants in your areas.



Gary Phillips

Corporate Safety & Loss Prevention

Attachments



- **New Superintendent Reactive Chem Reviews**

- **Reviews should be done “by” the Supt. versus “for” the Supt. (RC Teams)**
- **If Consolidated Audit is used for the New Supt. Compliance the Review should be done by the Supt. (RC Teams)**
- **Need to maintain the 90 day review compliance (RC Teams)**
- **Encourage Manager Participation where Practical (RC Teams)**
- **Maintenance Supt. should have Reactive Chem. Reviews and Training (RC Teams)**
- **Research should Clarify and Communicate their Reactive Chem Audit and Review requirements (Research Safety and Mgt)**

Operating Discipline

- Improve Information Utilization**
 - » Consider Collecting Root Cause of Incidents (RC Mgr and All)**
 - » Reactive Chemicals Data Base Use.... Knowledge of Existence, Speed, User Friendliness (RC Mgr)**
 - » Dev General Graphical Training Materials (RC Mgr)**
 - » Utilization of Risk Assessment Resource**
- Consider a Global Reactive Chemicals Standard (RC Mgr)**
- Training and Knowledge Is In Place with Plant Personnel Relative to Reactive Chemicals**
 - » Recommend Training Reviews Include an Assessment of Comprehension (Plants, Management)**
 - » Tech Centers should Periodically Recommunicate their Technology**
 - Picture or Video Incident Reminder Process (Tech Centers) Letter from Bill Knee Attached.**
 - Consider Dev. of Fundamental RC Chemistry Template for Technology (RC Teams and Tech Centers)**
 - Consider Technology Specific Reactive Chemicals Training for Technical People in a New Technology (Tech Centers and Plants)**
 - Tech Centers could Benifit In Some Reactive Chemicals Technology Training**



The Dow Chemical Company
Midland, Michigan 48674

2030 DOW CENTER
February 23, 1995

RESTRICTED FOR USE WITHIN
DOW AND DOW SUBSIDIARIES

TECH CENTER MANAGERS
TECH CENTER TECHNICAL MANAGERS

cc: Greg Dickson, 2020 Dow Center
John McKirdy, Hong Kong
Gary Phillips, 2020 Dow Center

REACTIVE CHEMICALS

As Gary Phillips and I have visited with several of the tech centers and their plants, the opportunity for improved communication of past reactive chemical incidents has surfaced several times. With the passage of time and the turnover of people, we can collectively "forget" some of our past learning experiences -- learning experiences for which we paid a high price.

The tech centers are looked upon as the repository of history for each of our technologies. They maintain the database of past safety, health, and environmental incidents that occurred both at Dow facilities and at the facilities of our customers, suppliers, and competitors. Periodically the tech centers must re-communicate the learning value of these incidents if we are to avoid repeating them. This is a part of our mission to Communicate Technology.

I believe that now, during 1995, is a good time for each tech center to re-communicate these learning experiences to each production unit around the globe throughout their technology. We have focused as a company on implementing the Strategic Blueprint, re-engineering our work processes, and achieving the Produce Product Expectations. All these activities are critical to our survival and future. We must achieve competitive advantage. What we cannot afford to do is to lose site of the basics of running our operations safely and environmentally responsibly. Through daily contact, plant reviews, and periodic special communications the tech centers can contribute technology, operating discipline, training, and an historical perspective on the breakthrough improvements we need while diligently operating our facilities safely, soundly, and reliably.

Best regards,




P.S. Several people have suggested to Gary Phillips and me that pictures and videos of incidents are an effective medium of communication for reactive chemical incidents. You may want to consider building and maintaining your tech center reactive chemicals database to include these media.

DO 144297
CONFIDENTIAL

TO: LACSDC::U134470 ! {U134470} BERNAT, WILLIAM (WC), 504-353-8034
LACSDC::U912532 ! {U912532} LEIGH, TERRY (TE), 504-353-8913
LACSDC::MASEY ! {U432948} MASEY, JOHNNY (JW), 504-353-1549
LACSDC::STICKLEN ! {U738537} STICKLEN, MIKE (MJ), 504-353-8591

CC: DOWMAIL::U430432 ! {U430432} GALLANT, ROBERT (RW), 517-636-9639

SUBJECT: SAFETY PERFORMANCE

Guys, I really appreciate the way all the units are running. Most, if not all, are at record performance levels.

One area of concern I have in the area of safety is M.O.C. As we are making rapid changes in our processes, are we taking advantage of all the learning experiences of the past and the new tools we have today to make the technology changes we need to make safely?

Would each of you step back and do a personal assessment of how your Teams are doing in the area of Safety, Reactive Chemicals, and Technology Reviews prior to making operating changes in your units. I don't need a report, just your personal involvement and comfort that we have top-notch practices that are used.

Thanks,

Ken

jzs/4-25-95

DO 144298
CONFIDENTIAL

→ Ken H.

cc Area Maint Supd.



FYI

Star

Maintenance Contractors Association

Safety—Quality—Productivity
P.O. Box 150, Plaquemine, LA. 70765-0150

*For info
The new step
in our contract
3/15/95*

REC'D MAR 10 1995

March 6, 1995

Mr. Stan Cole
Maintenance/Construction
Bldg. 4109

Mr. Cole:

In support of Dow Chemical's 100% Compliance Safety Policy, each member company of the MCA has authored individual progressive disciplinary action policies regarding the use of Personal Protective Equipment.

These individual company policies are designed to ensure 100% compliance with Louisiana Division Personal Protective Equipment requirements.

If any questions arise resulting from this letter, please call me at extension 6300.

Thank You,

Ronald C. Lee
MCA President

cc: Pam Usie
MCA Files

DO 144299
CONFIDENTIAL



2030 Building
September 16, 1996

The Dow Chemical Company
Midland, Michigan 48674

DOW RESTRICTED

To: Manufacturing & Engineering Global Leadership Team
Business Manufacturing Directors/Leaders

cc: Bill Stavropoulos, 2030
Dave Buzzelli, 2030

SEVERE INCIDENT INVESTIGATION PROGRAM

Our safety performance is good and statistically on track to achieve our 2005 goals. However, our severity is high, as I addressed in my letter of September 10, 1996. The goal of no fatalities, that we have for each and every day, is not being achieved. The number and the nature of the fatalities that we experienced this year has demonstrated that our emphasis needs to be re-evaluated, and we need to try a different approach to ensure that everyone working at a Dow site or on Dow business is truly focused on safety.

To enhance our safety efforts, we will begin a Severe Incident Investigation program. The program will entail an investigation team that will, on short notice, go into a plant/site to investigate a current incident or recent incident that was either severe or had the potential to take a life. The investigation will be as rigorous as that done for a fatality. The investigation team will include a business manufacturing manager or site manager (team chairman), corporate safety manager, legal counsel, local technician, member of the most recent consolidated audit team, site safety manager and additional members based on the nature of the incident and to maximize safety learning.

I believe we can accomplish this increased learning and emphasis from about four of these Severe Incident Investigations per year. This effort in no way replaces the current safety program that each business, site and department is currently implementing. As I said in my earlier letter, I firmly believe we will achieve a significant safety performance improvement from our behavior based safety programs. This initiative will impact few of you directly, however, it may give us insight into our safety performance that we will be able to leverage for all of us. It is expected that the plant/sites will address the team findings, while those opportunities that are found to have broader application will be addressed globally.

We have reason to be proud of our past safety successes, however, our past is not a guarantee for future success. We must work hard at safety every day. It must be our number one priority.

Regards,


Arnold A. Allemang
Manufacturing & Engineering

Attachment

DO 144300
CONFIDENTIAL

Cris M
F.Y.I. - Please
review & let's discuss
when this kit is in
for
10/1/96