



DOW CHEMICAL U.S.A.

PLAINTIFF'S
EXHIBIT

DOW 75

October 30, 1985

LOUISIANA DIVISION
P. O. BOX 180
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SD4 388-8000

Roddey Peebles
Cell Service
Building 5601

cc: Jerry Martin

CATHODE BRUSHING OPERATION

We have reviewed the project for reducing the potential for employee exposure to asbestos from the brushing of cathodes and have concluded that an air permit modification should not be required.

The operation has been performed in an open area within the Cell Service Building (5601) by an operator wearing breathing protection. Although good housekeeping has been practiced, there is some potential to scatter the asbestos and create an exposure problem for other, non-protected employees.

With the revised system, the brushing will be performed completely within a booth (17'6" x 11'6" x 11'0") having an exhaust system equipped with an IMR Corporation Model "Hog" 2000 filtration system on the top. The system filters the air at 1850 cfm through a HEPA filter prior to its discharge into the building. HEPA filters are designed to meet the stringent OSHA asbestos regulations of 29 CFR 1910.1001. A slightly negative pressure is created in the booth which prevents the asbestos from being dispersed into other areas of the building.

The brushing operation will be performed by means of a specially-designed brush attachment on a Nilfisk Corporation Model 82 portable dust collector/industrial vacuum cleaner which is also equipped with a HEPA filter. Any small amount of asbestos that may fall to the floor of the booth will also be removed by the Nilfisk system.

Thus, there is no potential for emissions to the atmosphere from this operation and, therefore, an air permit modification should not be required.

Bob Kalish

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Environmental Services

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