



Building 3502W
November 4, 1994

Dow U.S.A.

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

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

State of Louisiana
Department of Environmental Quality
Air Quality Division
Nathan Levy
Asbestos Program Coordinator

PRODUCED FOR THE ASBESTOS DATABASE

DATE: 11-4-94

MASTER No. 066569 BH

SUBJECT: Asbestos Complaint

Dear Mr. Levy,

As requested, Dow is responding to the complaint the Department of Environmental received from Dr. Glenn M. Gomes, which described an alleged asbestos exposure incident at the Power I Plant in Plaquemine. After thoroughly investigating this alleged incident, Dow strongly feels that no improper renovation activities occurred, and that none of the Furnace and Tube Service (FATS) employees were exposed to friable asbestos-containing material in the course of performing maintenance on Boiler #2 during the referred to time period. The following discussion should help clarify any misunderstanding.

ORIGINAL SCOPE OF WORK

The original scope of the work performed on Boiler #2 included replacement of insulation, both asbestos-containing and non-asbestos type materials, refractory brick and steel associated with the roof and south wall of the boiler. Petrin and Furnace and Tube Service (FATS) were two contracting firms employed to complete the work. Petrin supplied asbestos abatement personnel to address the part of the job dealing with asbestos. Furnace and Tube was contracted to deal with the non-asbestos containing insulation, refractory brick and steel aspects of the work. A written job scope was prepared and given to FATS prior to their starting the job.

Before beginning the work, an on site discussion was conducted with job associated personnel from FATS, Petrin, and Dow. The topics covered included scope of the work, emphasis on the fact that asbestos was present in some locations of the boiler, and because of that, certified asbestos abatement trained Petrin personnel would be present to handle that portion of the job. FATS would only be allowed to work on material that was asbestos free. Petrin began some preparatory work in late February. Bulk samples were taken of material in various spots inside the boiler, and analysis completed prior to FATS coming on site.

SAFE WORK PRACTICE

There has been an overwhelming effort on the part of Dow to protect individuals from asbestos exposure. Some of the primary safe work practices followed during this job included:

DO 075604
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- (1) Petrin would complete their asbestos related work activities (e.g. sampling, removal, cleanup, encapsulation) prior to any FATS workmen entering the area to do their work.
- (2) If any questions arose regarding the nature of a material (i.e. asbestos containing or not), or if there were any scope changes to a job that would involve an unchecked material, a sample would be taken and the material identified, then work would proceed utilizing the proper contractor (Petrin if asbestos-containing material is involved, and FATS if it is non-asbestos).
- (3) Material requiring asbestos analysis would be sent to a laboratory in Baton Rouge.
- (4) Asbestos abatement work practices would include:
 - a. Setting up regulated areas to limit access and minimize the potential for exposure;
 - b. Erecting enclosures or partial enclosures if feasible;
 - c. Using glove bags and wet removal techniques to prevent airborne fibers;
 - d. Cleaning, vacuuming with a HEPA vacuum and encapsulation would be employed following completion of asbestos removal activities;
 - e. Having an asbestos competent person on site at all times to supervise asbestos removal activities, answer any questions, and address any concerns.

ENLARGEMENT OF SCOPE OF WORK

During the performance of refractory and steel work involved in the original job scope, some additional boiler related maintenance repair needs were uncovered, and the original job content was enlarged. This additional repair work involved the east, west and north walls of Boiler #2. Samples of material from these areas were taken and sent to Baton Rouge for analysis. Analytical results for the initial samples analyzed were mixed (i.e. some samples were asbestos positive and others asbestos negative), therefore a decision was made to employ Petrin asbestos abatement personnel in the removal of all insulative and gasket material in those locations regardless of whether it was asbestos-containing or not. Petrin followed abatement work practices appropriate for the type of material involved, and upon completion, FATS personnel moved into the area to perform their part of the required repairs.

CONCLUSION

Dow has a specific plant indoctrination for each plant. The plant indoctrination which every FATS employee was required to receive stated that there was asbestos located in the Power I Plant block, and then explained the hazards associated with asbestos. In addition, concern for the safety and health aspects of this job are evident by the fact that a Petrin asbestos competent person was kept on site during the entire job, even when asbestos-containing material was not being worked on, in order to be present to answer questions and address any concerns. Also, Dow supervision was there to ensure compliance with safe work practices and procedures associated with the job, enforce Dow standard practices, and ensure compliance with appropriate governmental regulations.

Thank you for this opportunity to respond. If you have any further questions concerning this matter, please call Bruce Heinze at (504)-353-1817.

Sincerely,


Bruce Heinze
Industrial Hygiene



State of Louisiana
Department of Environmental Quality



Edwin W. Edwards
Governor

William A. Kucharski
Secretary

October 25, 1994

RECEIVED

OCT 28 1994

IND. HYGIENE DEPT.

Bruce Heinze
DOW Chemical
Post Office Box 150
Plaquemine, LA 70765-150

RE: Asbestos Complaint

Dear Mr. Heinze:

The Department received the enclosed letter from Dr. Glenn M. Gomes, which describes an asbestos exposure incident at the DOW Chemical Plant in Plaquemine. According to a patient of Dr. Gomes, improper renovation activities took place in the plant's Power One Block from February to March. Workers of a subcontractor company called Furnace and Tube were exposed to friable asbestos. The workers were unaware that they were being exposed to asbestos until the project was close to completion. According to the complainant, when the project was near completion, a licensed asbestos contractor was brought in to remove the remaining asbestos.

Our records indicate that two asbestos disposal verification forms (ADVF) were issued for the Power One Block for dates which correspond to those noted in Dr. Gomes's letter. Enclosed you will find copies of the notification forms (AAC-2 forms) which DOW submitted.

The Department requests that you reply to this complaint within 10 days of receipt of this letter. If you have any questions concerning this matter, I can be reached at (504) 765-0899.

Sincerely,

Nathan Levy
Nathan Levy
Asbestos Program Coordinator
Air Quality Division

NL//RMM/rmm

Enclosures

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recycled paper

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

AN EQUAL OPPORTUNITY EMPLOYER

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**OCHSNER CLINIC OF BATON ROUGE
16777 MEDICAL CENTER DRIVE
BATON ROUGE, LOUISIANA 70816**

Telephone 755-5200
Area Code 504

October 13, 1994

RECEIVED

OCT 28 1994

Mr. Nathan Levy
P. O. Box 82135
Baton Rouge, LA 70884-2135

Dear Mr. Levy:

It has come to my attention through one of my patients that there is a significant problem with asbestos exposure at industrial work sites in this area. Specifically my patient worked for a company called Furnace and Tube in Gonzales, Louisiana, and was a subcontractor at the Dow Plant in Plaquemine. He relates to me that they worked on an electrical generation boiler at Power One Block at the Dow plant in Plaquemine from a period of around February through May of 1994. During this time they were exposed to asbestos without any respiratory protection in a poorly ventilated area inside of a boiler. The employees found out that the boiler was insulated with asbestos products when they had nearly completed the job. Individuals wearing respiratory protection and asbestos abatement equipment came in and finished the work. My discussions with my patient have led me to believe that this is somewhat of a common practice, especially among small subcontractors who are working at larger facilities such as the Dow Plant in Plaquemine.

I would appreciate it if you would look into this unregulated and unprotected exposure to asbestos.

Respectfully yours,



Glenn M. Gomes, M.D.
Department of Pulmonary Medicine
Ochsner Clinic of Baton Rouge

GMG/drm/14

RECEIVED
OCT 21 1994
DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

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PLANNED SHUTDOWN ASBESTOS QUESTIONNAIRE

Plant: OXYGEN SUPPLY

Shutdown Schedule:

Start: DECEMBER

Completion: 1/95

Shutdown Description: AIR LIQUIED WILL TAKE DOWN THE LOCAL O2 DISTRIBUTION SYSTEM FOR 30 HOURS FOR TIE-INS.

1. Is any Regulated Asbestos-Containing Material (RACM) being removed or disturbed (RACM includes asbestos gaskets)?

Yes ☒ No ☐

IF THE ANSWER TO #1 IS NO, PLEASE SIGN BELOW AND RETURN TO I.H.

2. If Yes, is the RACM friable or will it become friable in the course of doing the work?

Yes ☐ No ☒

IF IT IS REASONABLE TO EXPECT THE RACM WILL BECOME FRIABLE, AN ADVF SHOULD BE OBTAINED TO AVOID POSSIBLE JOB INTERRUPTING CIRCUMSTANCES.

3. If Yes, (Question #2), contact I.H. at extension 1817.

4. Is there any demolition activity associated with the shutdown? Demolition is defined as the wrecking or taking out of any beam or load-supporting structural member of a facility?

In the context of this regulation, a facility is considered a building and not process related equipment (e.g., reactors, distillation columns, tanks, exchangers, piping, pipeways and associated equipment).

Yes ☐ No ☒

IF THE ANSWER IS YES, AN ADVF MUST BE OBTAINED FROM THE DEQ AT LEAST 10 WORKING DAYS PRIOR TO STARTING THE DEMOLITION.

Form Completed By: E M MORRISON

Date: 11/8/94

RETURN TO:

Bruce Heinze
Industrial Hygiene Department
Building 3502W

Rev. 3/92

PRODUCED FOR THE ASBESTOS DATABASE

DATE: 11/8/94

ASBESTOS No. 433021

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