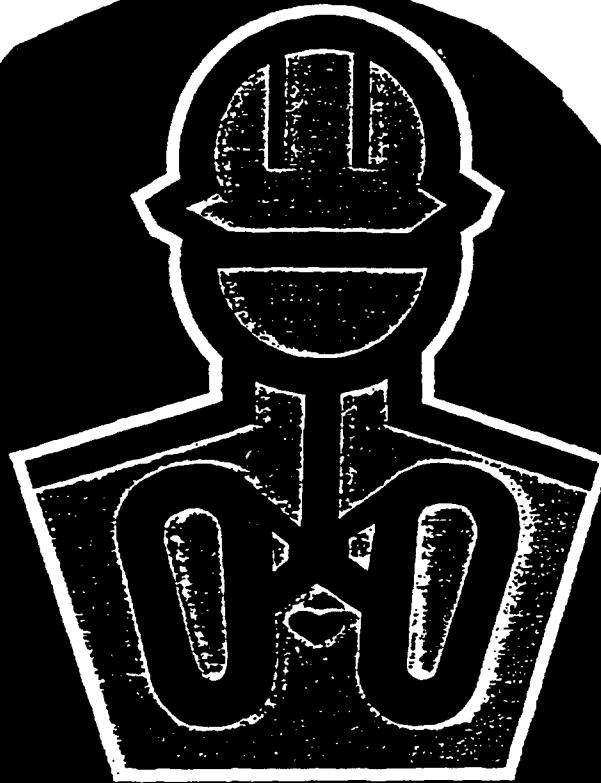


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**BASIC REQUIREMENTS
FOR AN
INDUSTRIAL HYGIENE
PROGRAM**

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OCCUPATIONAL HEALTH POLICY

The Dow Chemical Company

The Dow Chemical Company will implement appropriate action to further protect the health of Dow employees and the public by continuing to assess the health and environmental information related to its processes and products.

As with safety, occupational health is the direct responsibility of management as well as a responsibility of each Dow employee.

October 1984



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THE DOW CHEMICAL COMPANY INDUSTRIAL HYGIENE PROGRAM

INTRODUCTION

An effective Occupational Health program is the objective of the Dow "Occupational Health Policy" and "Dow and the Work Environment". Industrial Hygiene together with Occupational Medicine programs are important elements of the Occupational Health program.

Dow's commitment to provide and maintain a healthy work environment is the foundation for basic requirements upon which all Area Operations can build their own Industrial Hygiene programs directed at their specific needs.

Many of the requirements are based upon and referenced to existing Dow principles, guidelines and programs.

Line management has the responsibility to maintain a healthy work environment. Industrial Hygiene functions are provided on a Corporate, Area and location basis to assist line management in maintaining that healthy work environment.

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BASIC REQUIREMENTS FOR AN INDUSTRIAL HYGIENE PROGRAM

Each location shall establish an Industrial Hygiene Program for the detection, surveillance and control of potential health hazards which can potentially affect the health of its employees and that of the public. The program shall include the following specific elements and systems.

1. GENERAL

- a. A person shall be assigned to coordinate the program.
- b. Technical support will be provided to assess the health and environmental information related to intended uses of Dow products.
- c. The industrial hygiene function will actively participate in hazard communication programs.
- d. A written description of the overall program including a means for implementation is expected to be present.
- e. The program status shall be reviewed annually by the location and periodically by Corporate Occupational Health personnel.
- f. The industrial hygiene function will maintain ongoing communications with occupational medicine and other functions (e.g. Safety, Toxicology, Epidemiology and Environmental Services) to assess the effectiveness of established programs.

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2. IDENTIFICATION AND PRIORITIZATION OF NEEDS

- a. Operations, emphasizing R&D and Manufacturing, shall be analyzed to identify exposures to chemical, biological and physical agents with potential health significance in the workplace and to set priorities for training, monitoring, and control activities.
- b. A mechanism shall be established to review the industrial hygiene considerations of the design, modification, divestiture and acquisition of facilities and processes.
- c. Support will be given in reviewing and assessing the health considerations resulting from the use and distribution of Dow products to customers and potential impact to the public.

3. EXPOSURE EVALUATION

- a. A written plan shall be established for conducting periodic reviews to evaluate potential sources of exposures, the effectiveness of control methods and to set priorities for in-depth exposure monitoring.
- b. Industrial hygiene monitoring surveys shall be performed with sampling strategies designed to produce cost effective exposure data and estimates which are useful for correlation with medical surveillance data and for evaluating compliance with Dow exposure guidelines and government regulations.
- c. A system shall be established to ensure data quality.

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4. EXPOSURE CONTROL

- a. A mechanism shall be established for selecting and applying appropriate corrective measures where monitoring results, new information or other observations indicate a need to reduce the potential for exposure during normal operations as well as emergencies.
- b. Engineering control shall be emphasized, but consideration must also be given to administrative and work practice controls and to the provision and use of personal protective equipment.

5. COMMUNICATION AND TRAINING

- a. Communication and training programs shall be provided for employees potentially exposed to chemical, physical or biological agents. These programs shall include contractors as appropriate.
- b. Employees shall be informed of the following: the potential health effects of chemical, biological and physical agents; location of health and safety information sheets; methods to detect and control exposures; levels of exposures and employees' responsibilities to follow established safe work practices.

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6. DATA MANAGEMENT

- a. Procedures shall be established for the timely documentation and communication of findings from industrial hygiene surveys.
- b. Formal reports and/or data management systems shall be used to organize, store and retrieve industrial hygiene chemical inventories, exposure data, work history data and training records.

7. REGULATORY COMPLIANCE

Knowledge of applicable regulations shall be acquired. Programs shall be established and implemented to achieve compliance with government regulations.

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