

CHLOROHYDRIN OXIDES AND GLYCOLS

TECHNOLOGY CENTER

PLAINTIFF'S EXHIBIT

DOW-1875

I. SAFETY AND LOSS PREVENTION

FREEPORT - Dan Correll

A PCH spill occurred when a pressure transmitter on PCH line at the epoxidation mixer broke-off due to vibration on a thin wall titanium nipple.

There was a P.O. spill at a sample valve due to the ball valve failing and the valve not being plugged.

A shaft twisted off on the scrubber effluent EBV allowing PCH to back flow into the hypo and be pumped to Biox. Improper installation during capital construction was a factor.

Two flanges on a transfer line were found leaking. The line had not been blown with N2. Hydraulic expansion due to rising atmosphere temperature was the cause.

All the P.O. Finishing Job Procedures were updated during the Third Quarter. All of the operating personnel reviewed the P.O. Finishing Job Procedures.

MIDLAND - Dan Grieser

The Industrial Hygiene Protocol for the Dowanol*/Oxide area has been completed, including sampling with respect to process areas, specific job responsibilities, noise, and radiation. The last protocol update took place in 1985.

All F&E index calculations have been completed for the Dowanol*/Oxide area. A total of 26 individual areas were evaluated and their operations reviewed. A total survey is now being generated for review by area Safety and Loss Prevention personnel.

DOW CONFIDENTIAL

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I. Safety & Loss Prevention Midland Continued

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Meetings were held with all 353/290 Building employees to generate a housekeeping/safety project "hit list". The commitment has been given that the list will be prioritized and the top four or five items completed within the next couple of months. This program is intended to kick off a long-term drive to upgrade the facilities' appearance to match the upturn in business visibility.

The asbestos removal program for 353 Building has been concluded, with respect to indoor areas. Over the last 2 years, \$165M in demolition money has been spent to remove approximately 4,000-linear feet of asbestos on pipelines, and approximately 9,000-square feet of asbestos on equipment. A small quantity of asbestos remains on piping outside the building with removal due in November. This will complete the asbestos removal program for our area.

All products (in-process, experimental, and final) have been evaluated with their MSDS information to comply with the new Division labeling requirements. New labels are ordered and all personnel were trained in October.

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PLAQUEMINE - Jim Henry

We had four (4) minor first aid visits, eight (8) spills, and one (1) EPA non-compliance.

The EPA non-compliance was a result of a 12" butterfly valve failure. A spool piece was removed from the down stream side of the valve for maintenance. About one-half hour after the removal of the spool piece, the valve blew out. This resulted in a cell effluent spill. The valve was in the line going to the mixers which resulted in shutting down both reactors in order to stop the leak.

Spills

Five (5) of the spills were caused by reactor upsets. A small amount of chlorine was released from the vent scrubbers during each of these upsets. We are in the process of installing a faster reactor control system along with adding the chlorine stack probe to the scrubber control scheme. These will help to eliminate the recurrence of these spills.

Two (2) spills were associated with the PDC rail car spill. A chemical reaction was caused when finished PDC was loaded into two (2) aluminum rail cars. The result was that 20,000 gallons of PDC leaked to the ground. As a result of very quick effort by Dow personnel, only 200 pounds got to the river, the remainder was contained. The two (2) rail cars had been in crude PDC service for two (2) years prior to this incident. A computer system has been placed into service that will flag dispatcher on improper materials vs products so this will not happen in the future. We have modified our loading check sheets to reflect reactive chemical concerns for all of our products.

We had no CQSC's for the third quarter.