



DOW CHEMICAL U.S.A.

PLAINTIFF'S EXHIBIT

DOW-736

MICHIGAN DIVISION
January 8, 1990

Pete Lehman
Major Managers
Section Managers
Superintendents
Safety Engineers' Network
U.S. Area Safety

**1990 MICHIGAN DIVISION HEALTH, SAFETY, AND ENVIRONMENTAL TEAM
(HSET) GOALS AND PLANS**

Attached are the plans and goals for 1990 put together by the Health, Safety, and Environmental Team (HSET). Please consider for your plants/work units and as individual plans and goals are formulated for this new year.

The Health, Safety, and Environmental Team:

Mike Bator, 47 Building
Ben Baker, Ludington
John Borecki, 972 Building
Randy Croyle, 1261 Building
Brian Delaney, 990 Building
Tom Lipps, 607 Building

Terry Paquet, 743 Building
Alex Pollock, 258 Building
Bob Pratschler, 1175 Bay City
Bill Shelburg, 566 Building
John Tomke, 433 Building
Gene Wejrowski, 572 Building

Attachment

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1990 MICHIGAN DIVISION HEALTH, SAFETY, AND ENVIRONMENTAL PLANS

The performance of the Michigan Division in the areas of safety, health, and concern for the environment, is built on providing protection for our employees, having appropriate procedures in place, educating and training our employees, and recognizing their accomplishments. Continuous improvement of this performance can be facilitated by the implementation of the plans developed by our employees in their plant/work unit and the completion of the Division plans outlined below:

I. ALL PLANTS/WORK UNITS WILL ASSURE ENVIRONMENTAL COMPLIANCE WITH APPLICABLE DOW POLICIES AND GOVERNMENT REGULATIONS AND DEVELOP PLANS TO CONTINUE THEIR EFFORTS TO REDUCE WASTES AND EMISSIONS TO THE ENVIRONMENT

QUARTER

- 1st
 - a) *Assure air permit compliance by cross-checking air emission inventory data versus permit emission limits*
 - b) *(Midland site) Characterize all waste streams going to the Waste Water Treatment Plant*
- 2nd *Identify and eliminate an odor source in their operation*
- 3rd *Will review and modify, if necessary, their RCRA hazardous waste program*
- 4th *Will assure TSCA compliance in their operations*

II. IN AN EFFORT TO CREATE AN INJURY-FREE WORK ENVIRONMENT:

- A. *Each employee will establish a personal safety goal*
- B. *Each plant/work unit will identify and work on eliminating the top three potential safety hazards in their area*

III. QUARTERLY DIVISION-WIDE FOCUS TOPICS HAVE BEEN ESTABLISHED. RESOURCE MATERIALS WILL BE PREPARED FOR USE BY THE PLANTS/WORK UNITS IN THEIR SAFETY MEETINGS.

QUARTER

TOPIC

- 1st *Red Tag/Lockout (Safety)*
- 2nd *Driving Awareness (Safety)*
- 3rd *Substance Abuse Awareness (Medical, EAP - Employee Assistance Program)*
- 4th *Ergonomics/Health Surveillance (Medical, Industrial Hygiene, Safety)*

IV. EACH PLANT/WORK UNIT WILL DEVELOP FOR THEIR AREA A PROCESS FOR THE ONGOING MANAGEMENT OF ASBESTOS GASKET USAGE

- A. *Identify all areas where asbestos gaskets are used by end of 1st quarter*
- B. *Identify alternatives to asbestos gaskets in the 2nd quarter*
- C. *Begin phase out of asbestos in new applications in 3rd quarter*

V. EACH PLANT/WORK UNIT WILL CONDUCT A SIMULATED M.I.O.S.H.A. INSPECTION/SAFETY AUDIT DURING THE YEAR

VI. EACH PLANT/WORK UNIT WILL IMPLEMENT PROCEDURES TO EDUCATE ALL NON-BUILDING PERSONNEL TO THE POTENTIAL HAZARDS IN THEIR AREA PRIOR TO THE COMMENCEMENT OF WORK

Developed by the Health, Safety, and Environmental Team
R: 1/8/90

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