

Records Management Manual Changes - 1997

Listed below are the sections which have changes in them as well as the sections which have been deleted or added. Due to the massive number of changes, please review these changes as well as the sections of the manual which apply to you.

First Quarter:

New Sections:

Deleted Sections:

Record Changes:

1161	Change	Case Histories, Non-U.S., U.S. Issued
1161	Change	Case Histories, Non-U.S., Dropped
1161	Change	Case Histories, U.S. Dropped
1161	Change	Case Histories, U.S., Dropped With Live Offspring (CIP, etc.)
1161	Change	Disclosures of Inventions - Inactive
1161	Change	Patents, Originals, Non-U.S. (Dow)
1161	Change	Patents, Originals, U.S. (Dow) not maintained
1501A	Change	Release of Proprietary Information to the Outside
1502A	Add	CHEC (Flammability/Reactive Expert System FlamES, RstatES)

Second Quarter:

New Sections:

999	Added	Deleted
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Deleted Sections:

541	Delete	Administration
695	Delete	Chemicals and Plastics (Global)
1201	Delete	Planned Innovation
1881	Delete	Well Department

Record Changes:

631	Delete	Dateline, Master
631	Change	Dow Video File Footage
631	Delete	Electronic Type Setting Disk
631	Delete	Genigraphic File
631	Delete	Graphic Arts Print Production Job Folders
631	Delete	Invoices, Art and Mechanical, etc. (Accounting Master) (Marketing Communication copy)
631	Delete	Phone Logs
631	Delete	Plan Books
631	Delete	Reports on Outside Policy Making Organizations (including individual organizational files)
941	Delete	O.P.I.C. Contracts and Regulations, All Terms Expired
941	Delete	Renegotiation Reports
941	Delete	Renegotiation Workpapers
941	Delete	Thank you letters, and all other records
1401	Delete	Biographical Sketches and Photographs Other than Officers and Directors and Newsworthy Individuals, Former Employees
1401	Delete	Editorial Material, Master Copies (Sequence File Including Speeches)
1401	Change	News Releases, Dow Today, Centerline, etc. Master (no backup)
1401	Delete	President's Letters
1401	Delete	Publications, Extra Copies, External/Internal

1401	Delete	Scripts
1401	Delete	U.S. Public Issue Committee Minutes
1401	Delete	World Dow Press Analysis - Corporate Office Copy
1491	Add	Department Statistics
1721	Add	Keep-Out Notice

Third Quarter:

New Sections:

Deleted Sections:

Record Changes:

501	Add	Benefits & Trust (HESP/SESP/Point of Service/Pension Recons
628	Add	Organization Charts
905	Delete	Client Files (Scheduling Data)
975	Delete	Signed Access Authorization
1401	Add	Awards (President)
1401	Add	Communications Advisory Panel (CAP)
1401	Add	Contributions - Company Foundation
1501A	Change	Correspondence, General R&D

Fourth Quarter:

New Sections:

Deleted Sections:

Record Changes:

628	Delete	General Reference Material
628	Delete	Reference Material, General
721C	Add	Destroyed Cylinders
721C	Add	Hydro-test Unit Pressure Gauge Calibration
721C	Add	Hydro-test Facility 5-Year Requalification
721C	Add	DOT Training Records
731	Delete	Treaty Accounting Files
731	Add	Global Clearing
731	Add	Insurance Accounting Files (Treaty & Dow Programs)
861A	Change	Title XXIII changed from Regulation Development Records to Requirements Records
861A	Change	Environmental Incident Data
861A	Add	Global Emissions Inventory (GEI)
901	Add	Shareholders of Record - Microfiche
9611	Delete	Reference Material
1001	Delete	Reference Files
1005	Delete	Reference Materials
1091	Delete	Health Services Reference Materials
1091	Delete	Reference Materials
1761	Change	Reference Files changed to Tax Research Files

9008 Building
December 8, 1997

TO: Records Management Manual Holders

If records are frozen and have expired retentions please call the appropriate contact person for instructions pertaining to the storage of these records. Expired records are not to be retained in the owning department.

Please inform the appropriate people in your area of the documents which have been frozen. This freeze letter supersedes freeze letter dated December 2, 1996.

Summary of the Tax Freezes

Per the letters from Dorothy Hoffman dated November 1997, the following U.S. records are "frozen" from normal destruction until further advised by the Corporate Tax Department.

Section Number	Department	Type of Record	Years
501	Accounting	Accounting Entries: Quarter End B&A Reports Customer Invoices IRS Computer Tapes (including Accounting Detail File and Source Dictionary) Financial Statements Miscellaneous Debits/Credits Miscellaneous Invoices includes IDTs Property Schedules - Final Copies Royalty Agreements (Expired) Subledger Cost Sheets	1987 1987 - 1992 1987 1987 1987 1987 1987 1993 1987
751	Dow Credit Corporation	Project Files (and all items listed under that title)	1992 - 1993
905	Corporate Aviation	Schedule Sheets - Dow Form #48010	1992
907	Executive - Dow Club/CAC	Reservations, Functions and Rooms Schedule	1992
913	Financial - Corporate Treasury	Borrowings (other than Commercial Paper) (e.g., Loans, MTN's) Debenture Issues (Public) Interest Rate Hedge Report Interest Rate Instruments Position Summaries/Accruals Interest Rate Instruments, such as Swaps, Swaptions, Options (except Exchange Traded) Investment Contracts Leases, Agreements, All Terms Expired Notes and Credit Agreements - Dow Copy Operational Systems Backup Tapes Project Financing (including leasing, investments, venture capital) Promissory Notes (including Intercompany/Subsidiary) Sinking Fund Purchase Confirmation Letters Tax Exempt Bond Records * 1987 - 1993 also, if not already destroyed ** 1987 - 1989 also, if not already destroyed *** 1987 - 1992 also, if not already destroyed	1987 - 1990 1987 - 1990 1994 - 1996* 1987 - 1996 1987 - 1990 1990** 1993*** 1987 - 1993 1989 - 1990 1987 - 1993 1987 - 1993 1993 - 1996*** 1987 - 1990

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DO 006151

Summary of the Tax Freezes Continued

Section Number	Department	Type of Record	Years
1171	Payroll	Payroll Register; Check, Earnings, Tax, etc. Payroll Statistical Detail Tax Reports to Tax Department W-2 Statements and W-4 Forms	1987 - 1991 1987 - 1991 1987 - 1991 1987 - 1991

Summary of the Legal Freezes

Per the letter from Pat Gruber dated November 1996, the following records are "frozen" from normal destruction until further advised. This freeze pertains to U.S. records unless otherwise indicated.

Document which is frozen - BRAZIL THEFT LOSS LITIGATION

Brazil Theft Loss litigation - all documents created in the United States and Brazil generated from 1982-92 regarding sales transactions, business team meetings, internal controls and reporting within the various Dow/DowElanco locations.

Contact Person	Location	Phone Number
Greg Smith	Midland	(517) 636-8509

Document which is frozen - EXXON CHEMICAL PATENTS INC. AND EXXON CORPORATION

Complaint against Exxon Chemical Patents Inc. and Exxon Corporation filed October 25, 1994. Documents subject to this freeze are those concerning any actual or potential use of any AFFINITY or ENGAGE polymer, or any composition/formulation containing such polymer, or any INSITE technology Polymer ("ITP") or any competitor polymer, commercial or experimental, in a wire and cable end-use application. This includes, for example, all test data and information in Dow's possession in the U.S. about the polymers per se and any composition/formulation containing such polymers which has been evaluated by Dow or its customer(s) as an insulating layer, a shield layer and/or as a jacket layer in wire and cable article. The data and information may be experimental or developmental or commercial and it may have been generated by Dow and/or its customers or even by Dow consultants. The data and information may be technical and /or business oriented and it may be in the public domain or it may be Dow Confidential. The business oriented information includes documents concerning Dow's polyethylenes for wire and cable which contain information on marketing, sales, customer, sales calls, competitors (particularly Exxon and Mitsui), product developments, pricing sheets/policies, costs, profits (actual or potential), financial projections, and the like. Primary sources of such data and information are likely to be within Dow's Polyolefins and Elastomers business and sales offices having responsibility for wire and cable. Particular emphasis should be applied to documents referring to any meetings or communications between Exxon and Dow or between Exxon and any potential or actual wire and cable customer (individually or collectively as an industry segment) concerning the use of any of Dow's polymers in the wire and cable field or concerning Exxon's wire and cable patent (USP 5,246,783) or any Dow generated or customer generated document concerning USP 5,246,783.

Contact Person	Location	Phone Number
Duncan Stuart	Midland	(517) 636-5750

Document which is frozen - LIQUID CARBON DIOXIDE

All documents relating to Dow's Purchase (i.e. purchase price, quantity, etc.) and use of Liquid Carbon Dioxide in bulk in the United States but excluding pipeline or cylinder purchases for the period January 1, 1968 to and including October 26, 1992. No document collection is being made at this time but may be required in the future to prove Dow's damages. Any expired records should be sent to Jean Crites.

Contact Person	Location	Phone Number
Jean Crites	Louisiana	(504) 353-8166

Document which is frozen - ASTRO-VALCOUR, INC.

All documents relating to a complaint against Astro-Valcour, Inc., alleging infringement of Dow's U.S. Patent Nos. 5,424,016, 5,585,058, 4,640,933, 4,663,361 and 4,694,027. The '016 and '058 patents are directed to extruded polyethylene foam containing a permeability modifier which has been perforated. The others are directed toward the use of isobutane to blow polyolefin foams. Dow's products which relate to these patents are its ETHAFOAM** sheet and plank products, and its Strandfoam ** products. Documents subject to this freeze include: R&D reports and other documents relating to perforated or unperforated, extruded polyethylene foam in plank or sheet form, whether or not containing a permeation modifier. This includes records relating to processes for making the foam and using it as well as studies of the performance and characteristics of the foam. All documents relating to U.S. Patent Nos. 5,424,016, 5,585,058, 4,640,933, 4,663,361 and 4,694,027 and all U.S. and foreign patent applications relating to the subject matter of those patents. All correspondence, product and sales records, reports of call, manufacturing records and market reports, analyses and studies relating to perforated or perforated, extruded polyethylene foam sheet or plank products. This includes products of Dow, its competitors and its customers. Documents relating to extruded polyethylene foam products of Astro-Valcour, Inc. This would include any analyses or evaluations of Astro-Valcour products, or the markets, customers or applications for those products.

Contact Person	Location	Phone Number
Gary Cohn	Midland	(517) 636-2464

Document which is frozen - BREAST IMPLANTS

All documents referencing breast implants, or any component thereof, silicones; polyurethane, including polyurethane foam; toluene diisocyanate ["TDI"]; and "TDI" components including toluene diamine ["TDA"]; Scotfoam, Foamex. See attachment 1 to "TDI" collection letter dated November 1, 1993, and "Breast Implant Litigation" letter dated January 16, 1995 and Attachment (continuing the 1994 freeze) for further explanation. These documents need to be retained for document requests in the Breast Implant litigation.

Contact Person	Location	Phone Number
Mary Terzino	Midland	(517) 636-9246

Document which is frozen - OASIS PIPELINE FILES

All collected records, currently located on the third floor Records Center at ABP in Freeport, arising from litigation between Dow and Oasis Pipeline.

Contact Person	Location	Phone Number
Paula Matzke	Freeport	409-238-2688

Document which is frozen - HOUSTON LIGHTING & POWER RATE CASE FILES

All twelve boxes of collected records, currently located on the third floor Records Center at ABP in Freeport, arising from litigation in utility rate cases in Texas Operations.

Contact Person	Location	Phone Number
Linda Fiegenger	Freeport	409-238-5595

Document which is frozen - CUSTOMER INVOICE RECORDS AND SALES RECORDS

All customer invoice records and sales records currently being maintained on microfilm at the Global Records Center.

Contact Person	Location	Phone Number
Lynn Schefsky	Midland	517-636-0523

Document which is frozen - COMPLAINT FILES FOR THE DOW CHEMICAL V. SUMITOMO CHEMICAL COMPANY LTD. OF JAPAN AND SUMITOMO CHEMICAL AMERICA, INC. OF THE UNITED STATES AND SUMITOMO CHEMICAL COMPANY LTD., ALONG WITH INABATA AMERICA CORPORATION AGAINST THE DOW CHEMICAL COMPANY

This freeze, originally issued October 18, 1996, remains in effect. However, this freeze is modified to include documents related to a lawsuit filed subsequent to October 18, 1996. On September 23, 1996, Dow filed a complaint against Sumitomo Chemical Company LTD. of Japan and Sumitomo Chemical America, Inc. of the United States in Federal Court in Bay City, Michigan alleging infringement of Dow's U.S. Patent Nos. 4,499,255; 4,778,863; and 4,785,061. Sumitomo Chemical Company LTD., along with Inabata America Corporation and Summit Specialty Chemical Corporation, filed a complaint against The Dow Chemical Company on January 30, 1997, in the U.S. District Court of Delaware for a declaratory judgment of noninfringement and invalidity of Dow's Patent Nos. 4,499,255; 4,778,863; 4,785,061; 4,585,838; 5,028,686. The patents in suit relate to all "epoxy resins" and all processes for preparing "epoxy resins", such as cresol epoxy novolac resin, having low hydrolyzable chlorides. The term "epoxy resin" has been defined in the above lawsuits and will be used herein below to mean "any glycidyl derivative of any compound having at least one aromatic hydroxyl group or aromatic amine group per molecule that is reacted with any epihalohydrin wherein the reaction for preparing the epoxy resin utilizes an organic solvent". Documents subject to this freeze are: R&D reports and other documents relating to all epoxy resins, particularly, cresol epoxy novolac resins and particularly epoxy resins having low hydrolyzable chloride content. This includes records relating to processes for making the epoxy resins, particularly cresol epoxy novolac resins, and using the epoxy resins as well as studies of the performance and characteristics of the epoxy resins, particularly cresol epoxy novolac resins. Also, all documents relating to U.S. Patent Nos. 4,499,255; 4,778,863; 4,785,061; 4,585,838; 5,028,686; and all U.S. and foreign patent applications relating to the subject matter of U.S. Patent Nos. 4,499,255; 4,778,863; 4,785,061; 4,585,838; and 5,028,686. Additionally, all correspondence relating to all epoxy resin products, particularly, cresol epoxy novolac resin products. This includes products of Dow, its competitors and its customers. All products and sales records relating to all epoxy resin products, particularly, cresol epoxy novolac resin products. This includes products of Dow, its competitors and its customers. All Reports of Call relating to all epoxy resin products, particularly, cresol epoxy novolac resin products. All manufacturing records relating to all epoxy resin products, particularly, cresol epoxy novolac resin products. This includes, but is not limited to, any and all documents prepared during the process of getting capital authorized for equipment necessary to produce epoxy resin products, particularly, cresol epoxy novolac resin products, and any underlying economic evaluations. All marketing reports, analyses, studies, etc., done or prepared in connection with all epoxy resin products, particularly, cresol epoxy novolac resin products. This includes products of Dow, its competitors and its customers. All marketing reports, analyses, studies, etc., relating to all epoxy resin products, particularly, cresol epoxy novolac resin products which mention any product of Sumitomo. Any documents relating specifically to all epoxy resin products, particularly, cresol epoxy novolac resin products. This includes products of Dow, its competitors and its customers. Documents relating to all epoxy resin products, particularly, cresol epoxy novolac resin products of Sumitomo. This would include any analyses or evaluations of Sumitomo products, or the markets, customers of applications for those products.

The term "document" means a writing of any kind (original and any non-identical copy [e.g., a draft of the document or a "b.c.c." version with or without notes to the b.c.c. recipients] or a version with draft-marginalia), picture, phonographic recordings, and every other media on which information is recorded (e.g., hard, floppy or laser disks). Thus, the term is very broad and includes, without limitation, letters, memoranda, laboratory notebooks, reports, overhead slides, tables of data, books, periodicals, flipcharts, day planners, patent disclosures and applications, patents, product brochures, sales presentations, reports of call, fax messages, drawings, working papers, computer printouts, computer disks, photographic recordings, and the like.

C ntact Person	Location	Phone Number
Joe Prieto	Midland	517-636-9361



Document which is frozen - ASBESTOS-RELATED DOCUMENTS

All asbestos-related documents created in the United States. Also, all documents generated by contractors in connection with asbestos abatement projects on Dow premises. This freeze letter is to advise that the suspension of the records retention policy ("**freeze**") on asbestos-related documents initiated on December 17, 1990 has been modified but remains in effect and binding on all employees of The Dow Chemical Company in the United States.

For the purpose of this freeze letter, an "asbestos-related document" is to be construed in the broadest sense. A "document" includes any communication of any kind, including originals and all non-identical copies (whether different from the originals by reason of notations made on the copies or otherwise). Examples of documents include, but are not limited to, correspondence, memoranda, statistics, presentations, notes, letters, contracts, reports, studies, invoices, statements, receipts, inter-office and intra-office communications, printed matter, computer printouts, electronic communications and storage, other data compilations from which information can be obtained or translated, tapes, worksheets, day planners and logbooks.

A document is "asbestos-related" if it refers to "asbestos" in any way including, but not limited to, its uses, its presence, its potential health effects or its safe handling. If the document has the word "asbestos" anywhere on it, it is an asbestos-related document. Also, types of asbestos include amosite, anthophyllite, chrysotile and crocidolite. Due to the broad nature of the initial freeze and document collection effort, the Legal Department has identified certain document categories that are exempt from the freeze. Additionally, some categories of documents continue to be "frozen" but uncollected due to sheer volume and economics.

Important: If your files contain any asbestos-related documents marked with the Legal Department document number in the margin ("ST" followed by a seven-digit number) or stamped "produced for the asbestos database," it means the Legal Department already has a copy and it is not necessary to retain your copy beyond the normal retention time set forth in the Records Management Manual.

Because the asbestos premises litigation continues to grow, it is important for the originator of any future documents to furnish such documents to the Legal Department. Custodians of future documents may opt to produce them as part of the annual records retention review process or periodically throughout the year. Guidelines and instructions for handling future documents are enclosed. Documents should be sent to the contact identified in the attached guidelines.

Please ensure that all documents generated in connection with asbestos abatement projects are forwarded to Legal. Contractors performing this work must provide Dow a copy of all documents they create. Also, all documents pertaining to Industrial Hygiene or Environmental Department monitoring and testing for asbestos must be forwarded to Legal. If you have any questions regarding this freeze letter or the guidelines, please call Linda Fiegenger (409/ 238-5595) or the Legal Department contact for your division.

Contact Person	Location	Phone Number
Pattie Behmlander	Pittsburg, CA	(510) 432-5524
Anniece Zeno	Plaquemine, LA	(504) 353-8768
Pat Gaudreau	Michigan Div	(517) 638-7834
Linda Fiegenger	Texas Oper and all other	(409) 238-5595

Document which is frozen - FILM TEC		
Documents relating to the Film Tec litigation including those that relate to U.S. Patent 4,277,344; U.S. Patent 3,744,642; U.S. Patent 4,872,984; FT-30 membrane or UOP TFCL membrane or Hydranautics CPA-2 membrane; or Film Tec activities in making, using or selling Film Tec, UOP or Hydranautics membranes.		
Contact Person	Location	Phone Number
Steve Arnosky	Midland	(517) 636-0571
Document which is frozen - DOW LIABILITY INSURANCE COVERAGE		
Dow Liability Insurance Coverage Litigation (global)		
A. All claims, litigation and insurance files which contain one or more documents relating to allegations of personal injury or damage to property for which any of the following are alleged to be legally or contractually liable: The Dow Chemical Company, any of its past or present subsidiaries, or any joint venture of which any such company was a part. THIS DOCUMENT FREEZE DOES NOT APPLY TO CLAIMS, LITIGATION, OR INSURANCE FILES RELATING EXCLUSIVELY TO THE PRODUCT SARABOND.		
B. All documents comprising or referring to any liability insurance policy, including any documents that related to the extent of coverage provided under such policies, issued to any of the following: The Dow Chemical Company, any of its past or present subsidiaries, or any joint venture of which any such company was a part. It is anticipated that this document freeze will remain in effect at least through December 31, 1998. You will be notified in writing when this document freeze is lifted. Records which expire while this freeze is in effect should be sent to Records Retention; they should not remain in the originating department.		
Contact Person	Location	Phone Number
Greg Smith	Midland	(517) 636-8509
Contact Person	Location	Phone Number
Bill Herr	Midland	(517) 638-2053

- * Service Mark of The Dow Chemical Company
 ** Trademark of The Dow Chemical Company

Section Number	Department	Type of Record	Years
501	Accounting	This freeze affects all U.S. and Canada records: - Subledger (Quarterly) 1987 - Accounting Entries: Qtr End - Journal Vouchers 1987 - Transaction Recaps: Voucher Lists (Payments made by Accounts Payable) 1987 - Invoices (Paid in Accounts Payable) 1987 - Check Register - Accounts Payable 1991 - Source Documents: - Cash Banks - Cash Disbursements 1992 - Customer Adjustments/Offsets 1992 - Miscellaneous Debits/Credits 1987 - Miscellaneous Invoices Includes IDTs 1987 - Cancelled Checks (All) 1994 - Subledger Cost Sheet: IRS Computer Tape 1987 - Accounts Receivable Quarter End 1992 - Accounts Receivable Control Reports 1992 - JV Control Reports (receivables) 1987 - US Computer Tapes 1987 - Accounting Detail File FP9050.IRSDATA 1987 - Accounts Payable Detail FP9500.IRSDATA 1987 - Accounts Payable Vendor File FP9500.IRSVEND 1987 - Capitalization Support - Additions Authorizations	

Summary of the Legal Freezes Continued

Section Number	Department	Type of Record	Years
628	Communications (631) Environmental and Health Regulatory Affairs - Environmental (861A; 861B) Technology Centers (1781 & 1781A)	The following related to Dow's historic waste management practices, philosophy and technologies, including the use of off site waste management facilities: • General Reference Material • Guidelines, Policies, Procedures, Standards • Manuals -- Policies • Literature, Publication and Promotional Brochures -- Original and Copies	Retain all superseded items of this description 1991
631	Communications	The following related to Dow's historic waste management practices, philosophy and technologies, including the use of off site waste management facilities: • Issue Management Files • Literature, Publications and Promotional Brochures • General Reference Material • Guidelines, Policies, Procedures, Standards (see Section 628) • Manuals -- Policies (see Section 628)	1992 1991 to present Retain all superseded items of this description
861A	Environmental and Health Regulatory Affairs - Environmental	• <u>XV. Internal Reports</u> A. Issue Management Team Minutes B. Issue Management Team Policy Statements The following types of documents related to the <u>Dalton, GA</u> facility: • <u>VII.B. U.S. Area Environmental Compliance Audits or Environmental Assessments/Consolidated Audits</u> 1. Draft Audit Report 2. Final Audit Report 3. Corrective Action Plan(s) 4. Audit Working Papers (includes pre-audit questionnaire) 5. Status Reports 6. Follow-up Audit Report • <u>VIII. Enforcement Actions by Government Agencies (EPA, OSHA, FDA, ETC.) [only those action materials related to groundwater]</u> A. Retain contents relating to enforcement action until case is closed B. Closed - Resolved/settled (except dispositive documents) C. Closed - Unresolved (except dispositive documents) D. Dispositive documents (i.e. consent decree, final judgment, settlement agreement) • <u>XIII. Groundwater Records [all items listed in manual]</u> • General Reference Material • Guidelines, Policies, Procedures, Standards (see Section 628) • Manuals -- Policies (see Section 628)	1992 1994 Superseded Retain all superseded items of this description Retain all superseded items of this description Retain all Retain all superseded items of this description

Summary of the Legal Freezes Continued

Section Number	Department	Type of Record	Years
861B	Environmental and Health Regulatory Affairs - Health Sciences	Reports related to the chemicals listed in Attachment A. <u>XI. TSCA Section 8(c) Report of Adverse Reaction File</u> - Report of Significant Adverse Reaction, Occupational recordable 1967 - Report of Adverse Reaction, Other, recordable 1992 - Reports from Computer Log 1997 - Report of Adverse Reaction, Not Recordable 1997 - Disposition Letter 1997 - Review Committee Minutes 1997 <u>XII. TSCA Section 8(c) Report of Adverse Reaction Log</u> - Computer entries for filed reports, Employee Health 1967 - Computer entries for filed reports, Other 1992 - Computer entries for reports not filed 1996 - Indexes 1997 - Statistical Reports 1997 - Review Committee Minutes 1997 - General Reference Material - Guidelines, Policies, Procedures, Standards (see Section 628) - Manuals -- Policies (see Section 628)	Retain all superseded items of this description
901	Executive	Environmental, Health And Safety Committee Minutes	1992
1001	Legal	<u>General</u> - Legal Fees Paid - Backup for Report to IRS - On- and Off-site Disposal Records <u>Claims and Litigation - (Except Sarabond)</u> - Claims, Settled (complete file except releases, etc.) - Claims, Settled (releases, etc.) - Claims, Unresolved - Environmental Claims, Unresolved/Inactive for Five Years	1992 1947 1990 forward 1967 forward 1988 forward 1972 forward
1502	Health And Environmental Sciences	T.I.M.E. reports related to the chemicals listed in Attachment A.	Retain all

Summary of the Legal Freezes C ntinued

Section Number	Department	Type of Record	Years
1551	Risk Management, Corporate	• <u>Claims or Suits (Except Sarabond)</u> Closed Liability and Workers Compensation Closed Property: (excluding Cargo and Household Goods) Cargo and Non-U.S. Household Goods U.S. Household Goods • Insurance Manual • <u>Insurance Policies (original)</u> Liability and workers compensation and related correspondence Property (beyond expiration and all claims closed) • Insurance Policy Listings (current and expired master coverage list) • Loss Information	1967 1982 1989 1990 Superseded 1893 forward 1967 forward 1942 forward 1967 forward
1781	Technology Centers and Environmental Technology Center	• <u>Manuals and Bulletins related to the chemicals listed in Attachment A, Products Ins. Litigation:</u> Manufacturing & Sales Specifications Material Safety Data Sheets Raw Materials Specifications Product Sales Bulletins • General Reference Material • Guidelines, Policies, Procedures, Standards (see Section 628) • Manuals -- Policies (see Section 628)	1994 Retain all superseded 1994 1991 Retain all superseded items of this description
1781A	Environmental Technology Center	<u>Work Products</u> • Design, operating and procedural guidelines • Technical Memos • Technical Reports <u>Dow Plant, Site and Project Information</u> • General design information (not pertaining to a specific plant or project) • Operating manuals <u>Formal Reviews, Site Visits, Audits and Investigations</u> • Checklists/formats for environmental, technology and other reviews • Technology review reports and follow-up • Waste contractor evaluation/audit reports	Retain all superseded Retain all superseded Retain all superseded 1992 1994

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Freeze Letter
December 8, 1997

Summary of the Legal Freezes Continued

Section Number	Department	Type of Record	Years
1781A Cont'd	Environmental Technology Center	<u>Competitive and Comparative and Technology Information</u>	Retain all superseded
		• Literature surveys related to technology	
		<u>Dow Bulletins, Manuals and Misc. Information</u>	Retain all superseded
		• Manuals (Hazardous Chemicals, Industrial Hygiene, Product, Product Stewardship, Quality Assurance, Reactive Chemicals, Safety, Transportation, etc.)	Retain all superseded
		• Material, product & packaging lists and specifications	
		• Manuals and Bulletins <u>related to the chemicals listed in Attachment A, Products Ins. Litigation:</u>	
		Manufacturing & Sales Specifications (see Section 1781)	1994
		Material Safety Data Sheets (see Section 1781)	Retain all superseded
		Raw Materials Specifications (see Section 1781)	1994
		Product Sales Bulletins (see Section 1781)	1991
		• General Reference Material	Retain all superseded items of this description
		• Guidelines, Policies, Procedures, Standards (see Section 628)	
		• Manuals -- Policies (see Section 628)	

Larry Bowling, Secretary
Dow Records Management Committee
Records Management
(517) 636-0478

ATTACHMENT A
TO 1998 LEGAL DEPARTMENT
INSURANCE LITIGATION FREEZE LETTER

ENVIRONMENTAL INSURANCE LITIGATION CHEMICAL LIST:

1,1,2-TCA	aluminum	chloroform
1,2-dichloroethane	ammonium bifluoride	chloromethan
1,1-dichloroethane	ammonium bicarbonate	chlorophenols
1,1,1-trichloroethane	anthracene	chromium
1,1,1-trichloroethene	antimony	chrysene
1,2-dichloroethane	aqua ammonia	citric acid
1,1-dichloroethene	arochlor-1221	cobalt
1,2-dichloroethene (cis/trans)	arochlor-1242	copper
1,2-dichlorobenzene	arochlor-1254	cumene
1,1,2,2-tetrachloroethane	aromatics	cyanide
1,4-dichlorobutane	aromatic hydrocarbons	delta-BHC
1,4-dioxane	arsenic	di-n-butyl phthalate
1,2-dichloroethylene	barium	di-n-octyl phthalate
1,1-dichloroethylene (vinyl chloride)	beno(a)pyrene	dibenzo(a,h)anthracene
1,3-dichlorobenzene	benzaldehyde	dibenzofuran
1,2-DCA	benzamide sludge	dibromomethane
1,2,4-trichlorobenzene	benzene	dibromochloromethane
1,2-dichloropropane	benzo(a)anthracene	dichlorodifluoromethane
1,1,2-trichloroethane	benzo(a)anthracene/chrysene	dichlorofluoromethane
1,4-dichlorobenzene	benzo(a)pyrene	dichloromethane
1,1-DCA	benzo(b)fluoranthene	dieldrin
1-chloro-2-bromopropane	benzo(g,h,i)perylene	dimethyl phthalate
1-methylnaphthalene	benzo(k)fluoranthene	dioxin
2,4-dimethylphenol	benzoic acid	Dowtherm
2,3,7,8-TCDD	beryllium	eldrin
2,4,5-T	beta-BHC	endrin
2,4-dichlorophenoxyacetic acid (2,4-D	bibenz(a)anthracene	ethafoam
2-(2,4,5-trichlorophenoxypropionic	bio(z-ethylhexyl) phthalate	ethylbenzene
acid) (2,4,5-TP)	bis(2-chloroethyl)ether	ethylene dibromide
2-butanone	bis(2-chloroisopropyl)ether	fluoranthene
2-methylnaphthalene	bis(2-ethylhexyl)phthalate	fluorene
2-methylphenol	bromochloromethane	formaldehyd
4-bromofluorobenzene	bromodichloromethane	gamma-BHC
4,4'-DDE	bromoform	heptachlor
4,4'-DDD	bromomethane	hexachlorobenzene
4,4'-DDT	butylbenzylphthalate	hexachlorobutadiene
4-methylphenol	c-1,2-DCE	hexachloroethane
4-nitrophenol	cadmium	hydrochloric acid
acenaphthene	calcium	indeno(1,2,3-cd)pyrene
acetone	calcium chloride	iron
acrolein	carbon disulfide	isophorone
acrylonitrile	carbon tetrachloride	isopropanol
aldrin	chlordane	lead
alkanes	chlorinated hydrocarbons	magnesium
alpha-methylstyrene	chlorobenzene	malathion
alpha-BHC	chloroethane	manganese

ENVIRONMENTAL INSURANCE LITIGATION CHEMICAL LIST Continued:

mercury	sodium
methane	sodium bromate
methoxychlor	styrene
methyl cellulose	styrofoam
methyl methacrylate	sulfate
methyl ethyl ketone	sulfide
methyl methacrylate	sulfur
methylene chloride	TCB
molybdenum	tetraCE
naphthalene	tetrachloroethane
nickel	tetrachloroethene
nitrobenzene	tetrachloroethylene
PAHs	thallium
parathion	thiourea copper complexor
PCBs	thorium
pentachlorophenol	thurance
perchloroethylene	toluene
phenanthrene	toxaphene
phenol	trichloroethane
phenolformaldehyde	trans-1,2-dichloroethylene
polyethylene	trichloroethene (TCE)
polystyrene	trichloroethylene
potassium	trichlorofluoromethane
pyrene	trichlorophenoxyacetic acid (2,4,5-T)
selenium	vanadium
semivolatile organics	vinylidene
silver	vinyl toluene
soda ash	xylene
	zinc

PRODUCTS INSURANCE LITIGATION CHEMICAL LIST:

Amitrole Herbicide	Toluene
Benzene	Trichloroethylene (TCE)
Butadiene	Triethylene glycol
1,3-butadiene	Trimesol
Carbon disulfide	Tyrin CPE
Carbon tetrachloride	Vikane
Chlorothene	Vinyl chloride
1,1,1-trichloroethane (TCA)	Xylene
1,1,2-trichloroethane	
Dibromochloropropane (DBCP or <u>fumazone</u>)	
Diethylene ether (1,4-dioxane)	Non-Dow Products Named
Dowclene	Banvel
Dowicide TTM	Dioxin
Dowanol EB	Diazonon
Dowanol NV	Nitrosamines
Ethylene dibromide (EDB)	
Epichlorohydrin	
Esteron	
Garlon 4	
Kuron	
Methyl bromide	
Methyl chloride	
Methylene chloride	
Methyl ethyl ketone (MEK)	
Pentachlorophenol	
Perchloroethylene (PCE)	
Phenoxyherbicides	
2,4-D	
2,4,5-T	
D/Silvex D	
Silvex	
Polyvinyl chloride	
Styrofoam	
Tordon	
Tordon 101	
Tordon 101M	
Tordon 101R	
Tordon 155	