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1803 BUILDING
June 5, 1995

The Dow Chemical Company
Midland, Michigan 48674

Docket Office
U. S. Department of Labor
Occupational Safety and Health Administration
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OSHA
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TIME _____

DOCKET H-049, RESPIRATORY PROTECTION
DOCUMENT NUMBER 54-278 ADDENDUM

The Dow Chemical Company submitted comments to OSHA's docket numbered H-049 earlier this year. These comments were filed in the docket as document number 54-278. We would like this letter attached to that document as an addendum to correct a mistake made in those comments.

In our written comments I estimated the cost of annual medical evaluations, on page 19 I believe. I multiplied once too many times instead of multiplying and adding. In reality, assuming the medical evaluations cost about \$100 per evaluation, employee costs about \$40 an hour and, conservatively, about 1000 employees would be medically evaluated each year, the estimated cost would be about \$140,000, not \$4 million as our written comments indicated. To cover the cost of this aspect of the standard Dow would have to increase sales by about \$385,000 not \$11 million as the earlier written comments indicated. The \$140,000, while far less than previously identified, is still a significant number when experience indicates the additional testing is not necessary. That amount is equal to about two employees.

I am sorry for this mistake. If OSHA has any questions about this submission addendum please do not hesitate to contact me.

Sincerely,

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