From:	Lucas, Steve (C)
To:	Lucas, Steve (C); Browne, Elizabeth (DEQ)
Cc:	Taylor, Al (DEQ); Howe, Cheryl (DEQ); Montgomery, Delores (DEQ); MacKenzie-Taylor, Deb (DEQ); Ostaszewski, Arthur (DEQ); Crook, Marty (MD); Artz Patton, Helen
Subject:	RE: Dow MAS - RIWP RI Report and 2014 Adaptive Management Plan Extension Request - MID 000 724 724
Date:	Wednesday, October 16, 2013 4:19:57 PM

A slightly revised request correcting an inadvertent error in the original.

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Steve Lucas
Assoc. EHS Remediation Director
The Dow Chemical Company
Michigan Operations
1790 Building
Midland, Michigan 48667
Phone: 989-638-6012
E-mail: ***sclucas@dow.com***

From: Lucas, Steve (C)
Sent: Wednesday, October 16, 2013 4:08 PM
To: 'Browne, Elizabeth (DEQ)'
Cc: 'Taylor, Al (DEQ)'; Howe, Cheryl (DEQ); Montgomery, Delores (DEQ); MacKenzie-Taylor, Deb (DEQ); Ostaszewski, Arthur (DEQ); Crook, Marty (MD); 'Artz Patton, Helen'
Subject: Dow MAS - RIWP RI Report and 2014 Adaptive Management Plan Extension Request - MID 000 724 724

Liz,

The Interim response Activity Plan Designed to Meet Criteria (IRDC) for Midland Area Soils approved by The Department of Environmental Quality on June 1, 2012 requires The Dow Chemical Company (Dow) to submit to the agency a revised Scope of Work (SOW), a revised Remedial investigation Work Plan (RIWP), a Remedial investigation Report (RI Report) and a schedule for submittal of a RAP and RAP completion report on December 15, 2013. Dow is requesting an extension of the submission date for all of these plans/reports to December 15, 2014.

Dow, Dow consultants and MDEQ staff have been diligently working during 2013 to define and address remaining issues associated with the RIWP and RI Report. Significant progress has been made however there is remaining work to complete and evaluate an Ecological Risk Assessment for Midland Area Soils. This work cannot be completed and finalized in a report by December 15, 2013 and an extension of the due date is necessary. An extension of one year to December 15, 2014 is proposed to allow Dow and MDEQ staff to complete this work. A extension of this duration has the added benefit that it will allow the RI Report to contain a comprehensive evaluation of sampling for the entire Midland Resolution Area. When the IRDC was approved in 2012 full sampling of the Midland Resolution Area was not anticipated to be complete until 2017. Dow now reasonably expects to have this work completed during 2014 allowing all results to be included in an RI Report submitted December 15, 2014.

Dow is also requesting an extension of the due date for the 2014 Work Plan and Adaptive Management Plan from January 15, 2014 to March 1, 2014. DEQ recently approved a Dow request

to conduct additional sampling during 2013. The results from this sampling campaign are expected to be substantially complete during February 2014. An extension of the 2014 Work Plan and Adaptive Management Plan to March 1 will allow Dow to include an evaluation of results from the most recent sampling campaign in this work plan.

Should you require additional information on this extension request you or your staff may contact me at 989-638-6012 or by email at sclucas@dow.com .

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