From:	Lucas, Steve (C)
To:	Browne, Elizabeth (DEQ)
Cc:	Crook, Marty (MD); Madill, Scott (SA); Taylor, Al (DEQ); Montgomery, Delores (DEQ)
Subject:	Modification to Dow MAS - Additional 2013 Work Sampling Plan - MID 000 724 724
Date:	Monday, October 07, 2013 3:08:17 PM

The Dow Chemical Company is proposing a modification to some sampling plans provided as part of the Additional Work Proposed for 2013, Midland Area Soils originally submitted on September 19, 2013.

The utility locating service provided through "MISS DIG" has been struggling to provide timely utility location marking in past City of Midland sampling campaigns. For the next round of sampling they have indicated to Dow that they will only be able to meet our needs of utility location and flagging the 70+ properties each week we require if we significantly reduce the number of out lawns (generally between street and sidewalk) that we require utility locating services. The out lawn typically has a large amount of utilities and is fairly time consuming to locate and mark.

Dow is proposing to modify sampling plans to accommodate this request. Where we cannot get utility location and flagging completed in an out lawn we propose to move the sample point from the out lawn to the main lawn consistent with the requirements and specifications included in the approved work plan for moving a sampling point. Appropriate documentation of the change will be made. Where we can get utility location of the out lawn completed Dow will follow the approved sampling plan including any specified sample points located in the out lawn.

During the initial phase of sampling in 2012 DEQ approved a similar modification of sampling plans to enable sampling of property before we had received full access from the City of Midland to sample within the out lawns.

This change will not influence any require remedial actions. If a property requires clean up per the approved work plan we will obtain all utility location necessary and clean up the out lawn as well as the main lawn.

If you have any question or need additional information to approve this request please let me know.

_____

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

From: Browne, Elizabeth (DEQ) [mailto:BROWNEE@michigan.gov]
Sent: Wednesday, September 25, 2013 1:34 PM

To: Lucas, Steve (C)
Cc: Crook, Marty (MD); Madill, Scott (SA); Taylor, Al (DEQ); Montgomery, Delores (DEQ)
Subject: Dow MAS - Partial Approval for Additional 2013 Work - MID 000 724 724

Steve –

The Department of Environmental Quality (DEQ), Office of Waste Management and Radiological Protection (OWMRP), has completed a review of the Additional Work Proposed for 2013, Midland Area Soils Project, that is dated September 17, 2013, and was submitted by Dow via email on September 19, 2013.

The OWMRP is in the process of reviewing the 393 sampling plans that have been posted by Dow to the project SharePoint® site; however, this review will not be complete before September 27, 2013, when Dow is proposing to begin contacting residents for sampling access.

Therefore, partial approval of this additional work is being granted so that Dow can begin obtaining property access on September 27, 2013, in accordance with the conditions of the approved June 1, 2012, Interim Response Activity Plan Designed to Meet Criteria for Midland Area Soils and as described in the September 17, 2013, memo.

Final approval or approval with modifications for the sampling plan will be granted once the review has been completed.

Should you have any questions regarding this approval, please contact Ms. DeLores Montgomery, Chief, Hazardous Waste Section (HWS), OWMRP, at 517-284-6565 or montgomeryd1@michigan.gov; or Mr. Al Taylor, HWS, OWMRP, at 517- 284-6573 or taylora@michigan.gov; or you may contact them at DEQ/OWMRP, P.O. Box 30241, Lansing, Michigan 48909-7741; or you may contact me.

Liz Browne, Chief
Office of Waste Management and Radiological Protection
MI Department of Environmental Quality
brownee@michigan.gov
517-284-6552 – New Phone Number