



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

March 21, 2014

VIA E-MAIL and U.S. MAIL

Ms. Shari Kennett  
Responsible Care Leader  
Michigan Operations  
The Dow Chemical Company  
1790 Building, Washington Street  
Midland, Michigan 48674

Dear Ms. Kennett:

**SUBJECT:** Department of Environmental Quality (DEQ) Initiated Minor Hazardous Waste Management Facility Operating License (License) Modification; Amendment 16 - Approval of Quarterly Rather than Monthly Operating Report Submittal; The Dow Chemical Company (Dow), Michigan Operations, Midland, Michigan; MID 000 724 724

Staff of the DEQ, Office of Waste Management and Radiological Protection (OWMRP), has recently been in discussions with Mr. Jim Nemeth of Dow regarding changing the monthly operating report submittal frequency to quarterly via a DEQ-initiated minor modification to Dow's License issued June 12, 2003, as amended. This change is in response to a revision to R 299.9610(3) of the administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, that took effect on November 5, 2013. This change will streamline Dow's reporting requirements and necessitate less data entry by the DEQ. The DEQ's goal is to eventually move to electronic submittal of quarterly operating reports based on a mutual agreement between Dow and the DEQ.

Condition II.L.3. of Dow's License is hereby modified as shown by the deleted strike text and added bold text below:

3. Monthly Operating Report. The licensee shall comply with the ~~monthly operating~~ reporting requirements of R 299.9610(3). The ~~monthly operating~~ report shall be submitted **within 10 days after the end of March, June, September, and December of each year** on a form provided by the Office Chief, or an equivalent form that has been approved by the Office Chief, **unless more frequent submissions are required under this license**.

In accordance with R 299.9519(6)(b), Dow is requested to send notice of this minor modification to all persons on the facility mailing list and to the appropriate units of state and local government. Such notice must be provided within 90 calendar days of this

approval. The updated facility mailing list will be e-mailed separately to Mr. Brent Gaudreau later this month by Ms. Lindacarl Leiter. She may be contacted by e-mail at leiterl@michigan.gov. Please notify the OWMRP of any addresses on the facility mailing list that are returned to sender and provide a scan of the returns or the original envelope for our records.

Should you have any questions regarding this approval, please contact Ms. Cheryl Howe, Hazardous Waste Section, OWMRP, at 517-284-6561; howec@michigan.gov; or DEQ, P.O. Box 30241, Lansing, Michigan 48909-7741; or you may contact me.

Sincerely,

 acting for  
Bryce Feighner, Chief  
Office of Waste Management and  
Radiological Protection  
517-284-6551

cc: Mr. Brent Gaudreau, Dow  
Mr. Jim Nemeth, Dow  
Ms. DeLores Montgomery, DEQ  
Mr. Phil Roycraft /Ms. Trisha Confer, DEQ  
Ms. Ginny Himich/Ms. Cheryl Howe, DEQ  
Mr. Clay Spencer, DEQ  
Mr. Allan Taylor, DEQ  
Operating License File