

**AMENDMENT 3**  
**SUMMARY OF MODIFIED DOW OPERATING LICENSE CONDITIONS**  
**September 30, 2005**

<b>OPERATING LICENSE PART/CONDITION</b>	<b>DESCRIPTION OF REVISIONS</b>	<b>DATE(S) REQUESTED</b>
<b>COVER PAGE</b>	Revised the license cover page to reflect the repagination of the document necessary to accommodate added text and deletion of Attachments 12 and 29 that were done as part of Amendment 3. The revisions do not affect the issuance or expiration dates of the license.	DEQ Initiated Update
<b>TABLE OF CONTENTS</b>	Updated page numbers.	DEQ Initiated Update
<b>LIST OF ATTACHMENTS</b>	Updated to indicate dates that attachments were modified or deleted.	DEQ Initiated Update
<b>PART II - GENERAL OPERATING CONDITIONS</b>		
II.O. Cost Estimate for Facility Closure and Post-Closure	Closure cost estimate increased to correct error in Operating License.	5/21/04 8/9/04
II.U. Documents to be Maintained at the Facility	Revised to allow alternate records storage location other than at the facility.	7/26/04
<b>PART III - CONTAINER STORAGE CONDITIONS</b>		
III.A.1. and 2. Coverage of License	Revised to reference updated Waste Storage Area I drawings that reflect revised container storage configuration and revised drainage; revised Part A Map to update residential well locations near the facility as part of Compliance Schedule activities.	7/19/04 3/7/05
III.E.3. Management of Containers	Same as above.	7/19/04 3/7/05
III.F. Containment	Same as above.	7/19/04 3/7/05
<b>PART IV - TANK SYSTEM STORAGE AND TREATMENT CONDITIONS WASTE STORAGE AREAS IIA AND IIB AND THE 1163, 29, AND 33 BUILDINGS</b>		
IV.A.1. Coverage of License	33 Building Tank System as-built drawings incorporated into table; refer to the table in this condition for updated list of drawings.	6/19/03 3/2/05
IV.A.3. Coverage of License	Revised to reference updated Part A Map.	3/7/05

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IV.A.7. Coverage of License	Approves the as-built drawings and certification for the 33 Building tank system submitted on June 19, 2003, as of the date of the modification approval by the Chief of the Waste and Hazardous Materials Division	6/19/03
IV.B. Waste Identification and Quantity	Updated the approved acceptable waste types to be consistent with the bulk solids allowed to be managed in the 1163 Building tank system.	7/19/04
<b>PART V - INCINERATOR CONTAINER STORAGE CONDITIONS</b>		
V.A. Coverage of License	32 Incinerator Container Storage Area and Unloading Spots as-built drawings incorporated into table; refer to the table in this condition for updated list of drawings.	6/19/03 6/30/03 7/17/03 12/13/04
V.A.1. and 2. Coverage of License	Revised to reference updated Part A Map.	3/7/05
V.A.3. Coverage of License	Revised to delete the 703 hazardous waste and container management and certain waste receiving/unloading areas that are closed and approve the as-built drawings and certification for the 32 Incinerator Unloading Spots and 32 Building Container Storage Area submitted on June 19 and 30, 2003, August 30, 2004, and December 13, 2004, as of the date of the modification approval by the Chief of the Waste and Hazardous Materials Division.	6/19/03 6/30/03 7/7/03 8/30/04 12/13/04
V.A.4. Coverage of License	Deletes the requirements to 1) submit an updated partial closure plan for the 703 Building hazardous waste container management and certain waste receiving/unloading areas concurrent with the submittal of the 32 Incinerator certification, and 2) to implement the approved partial closure plan; these activities have been completed.	9/2/04
V.A.5. Coverage of License	Revised to reference the as-built drawings for the 32 Incinerator Unloading Spots and the updated Part A Map.	6/19/03 6/30/03 7/7/03 12/13/04 3/7/05
V.A.6. Coverage of License	Revised to reference the as-built drawings for the 32 Incinerator Container Storage Area and the updated Part A Map.	6/19/03 6/30/03 7/7/03 12/13/04 3/7/05

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V.A.7. Coverage of License	Revised to delete the reference to the closed 703 Building hazardous waste container management and waste receiving/unloading areas.	9/30/03
V.A.8. Coverage of License	Revised to reflect the as-built drawings incorporated into Attachment 13.	6/19/03 6/30/03 7/7/03 12/13/04 8/30/04
V.B.3., V.B.4. and V.B.5. Waste Identification and Quantity	Revised to reference the as-built drawings for the 32 Incinerator Unloading Spots.	6/19/03 6/30/03 7/7/03 12/13/04
V.B.7. Waste Identification and Quantity	Deleted "After the 32 Building Incinerator upgrade" to make the language current.	3/10/04
<b>PART VI - INCINERATOR TANK SYSTEM STORAGE CONDITIONS</b>		
VI.A. Coverage of License	32 Incinerator Tank System as-built drawings incorporated into table; refer to the table in this condition for updated list of drawings.	6/19/03 6/30/03 7/7/03 12/13/04
VI.A.1. and 2. Coverage of License	Revised to reference 32 Incinerator Tank System as-built drawings and updated Part A Map.	6/19/03 6/30/03 7/7/03 12/13/04 3/7/05
<b>PART VII - INCINERATOR TREATMENT CONDITIONS</b>		
VII.A.1. Coverage of License	Deleted language related to operation of 703 and 830 Incinerators to reflect closure of these units and added references to 32 Incinerator as-built drawings submitted on June 19 and 30, 2003, August 30, 2004, and December 13, 2004, as of the date of the modification approval by the Chief of the Waste and Hazardous Materials Division; refer to the table in this condition for updated list of drawings.	6/19/03 6/30/03 7/7/03 8/30/04 9/30/03 12/13/04
VII.A.2. Coverage of License	Deleted language related to 32 Incinerator shakedown periods because these activities have been completed.	9/30/03

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VII.A.3. Coverage of License	Revised to reference 32 Incinerator as-built drawings and updated Part A Map; refer to the table in this condition for updated list of drawings.	6/19/03 6/30/03 7/7/03 12/13/04 3/7/05
VII.A.4. Coverage of License	Revised to 1) delete requirement to submit an updated partial closure plan for the 703 and 830 Building Incinerators and ancillary equipment concurrent with the submittal of the 32 Incinerator certification; 2) cease operation of the 703 and 830 Building Incinerators after the 32 Incinerator shakedown period; and 3) implement the approved partial closure plan for the 703 and 830 Building Incinerators and ancillary equipment. These activities have been completed.	6/30/03 9/30/03 9/2/04
VII.A.5. Coverage of License	Revised to incorporate the 32 Incinerator as-built drawings into Attachment 17.	6/19/03 6/30/03 7/7/03 12/13/04
VII.A.6. Coverage of License	Revised to update the air permit reference to the Renewable Operating Permit issued by the DEQ Air Quality Division on March 29, 2004.	DEQ Initiated Update
VII.B.1. and 2. Maintenance of Facility	Revised to delete "After approval of the 32 Incinerator upgrade" to make the language current and to delete the reference to the 32 Incinerator Compliance Schedule because all the required work has been completed.	3/10/04
VII.C.1. Performance Standards and Operating Conditions	Deleted requirement to maintain and operate the 703 and 830 Building Incinerators in accordance with the applicable performance standards and operating conditions specified in Attachment 12 of this license because these units have been closed.	9/30/03
VII.C.2. Performance Standards and Operating Conditions	Revised to update the air permit reference to the Renewable Operating Permit issued by the DEQ Air Quality Division on March 29, 2004.	DEQ Initiated Update
<b>PART VIII - SURFACE IMPOUNDMENTS STORAGE AND TREATMENT CONDITIONS TERTIARY POND</b>		
VIII.A.1. and 2. Coverage of License	Revised to reference previously approved Tertiary Pond Plan View drawing (Operating License Amendment 1 on September 30, 2003) and updated Part A Map.	DEQ Initiated Update
<b>PART X - ENVIRONMENTAL MONITORING CONDITIONS</b>		

<b>OPERATING LICENSE PART/CONDITION</b>	<b>DESCRIPTION OF REVISIONS</b>	<b>DATE(S) REQUESTED</b>
X.A.3. Glacial Till And Regional Aquifer Detection Groundwater Monitoring Program	Changed Annual Groundwater Report submittal date from March 1 to April 15.	11/4/04
X.A.7. Glacial Till And Regional Aquifer Detection Groundwater Monitoring Program	Updated the name of the Section within the Waste and Hazardous Materials Division for reporting detection of an increasing trend in contaminant concentration(s) and deleted the reference to the Hazardous Waste Permits and Technical Support Unit	DEQ Initiated Update
X.B.3. and X.B.13.(e) Sludge Dewatering Facility Groundwater Monitoring Program	Changed Annual Groundwater Report submittal date from March 1 to April 15.	11/4/04
X.B.4. - X.B.6. and X.B.12.(d)(ii) Sludge Dewatering Facility Groundwater Monitoring Program	As a result of updating the Post-Closure Plan for Sludge Dewatering Facility (Attachment 23), changed references to Table XVIII.1 (in Attachment 25, Environmental Monitoring Tables and Figures) to Table 2 (in Attachment 24, Groundwater Monitoring Program Sampling and Analysis Plan).	9/9/05
X.B.7. Sludge Dewatering Facility Groundwater Monitoring Program	Updated the name of the Section within the Waste and Hazardous Materials Division for reporting detection of an increasing trend in contaminant concentration(s) and deleted the reference to the Hazardous Waste Permits and Technical Support Unit.	DEQ Initiated Update
X.C.3. and X.C.13.(c) Poseyville Landfill Groundwater Monitoring Programs	Changed Annual Groundwater Report submittal date from March 1 to April 15.	11/4/04
X.C.7. Poseyville Landfill Groundwater Monitoring Programs	Updated the name of the Section within the Waste and Hazardous Materials Division for reporting detection of an increasing trend in contaminant concentration(s) and deleted the reference to the Hazardous Waste Permits and Technical Support Unit.	DEQ Initiated Update
X.D.4.(b) Six Purge Wells Groundwater Monitoring Program	Changed Annual Groundwater Report submittal date from March 1 to April 15.	11/4/04
X.E.4.(c) Sand Bar Monitoring Program	Same as above.	11/4/04
X.F.3. and X.F.6. Tertiary Pond Monitoring Programs	Same as above.	11/4/04

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X.F.8. Tertiary Pond Monitoring Programs	Updated the name of the Section within the Waste and Hazardous Materials Division for reporting detection of an increasing trend in contaminant concentration(s) and deleted the reference to the Hazardous Waste Permits and Technical Support Unit.	DEQ Initiated Update
X.H.3. East-Side RGIS Chemical Monitoring Program	Changed Annual Groundwater Report submittal date from March 1 to April 15.	11/4/04
X.I.5. West-Side Main Plant and Tertiary Pond RGIS Monitoring Program	Same as above.	11/4/04
X.J.5. Facility Shallow Groundwater Monitoring Program	Same as above.	11/4/04
X.K. Ambient Air Monitoring Program	Revised to approve the updated Ambient Air Monitoring Program as of the date of the modification approval by the Chief of the Waste and Hazardous Materials Division; refer to update revisions described under Attachment 26 below.	11/8/04 12/13/04 1/14/05
<b>PART XI - CORRECTIVE ACTION CONDITIONS</b>		
XI.P. Corrective Action Documents Retention	Revised to allow alternate records storage location other than at the facility.	7/26/04
XI.Q. Soil and Groundwater Exposure Control Program	Revised as part of the revisions to the Facility Fugitive Dust Control Program to describe completed work; updated other language to reflect current conditions.	9/23/05
<b>PART XII - SCHEDULES OF COMPLIANCE</b>		
XII.A.1 and XII.A.3. Compliance Schedule for Environmental Monitoring and Corrective Action for Units Other Than the 32 Incinerator	Revised to reflect revision date of updated Compliance Schedule; revisions were made to reflect progress on Midland Plant corrective action activities and modification of due dates.	3/30/05
XII.B. 32 Incinerator Upgrade Compliance Schedule	Deleted because all 32 Incinerator Compliance Schedule tasks have been completed.	3/10/04
<b>LIST OF ATTACHMENTS</b>		

<b>OPERATING LICENSE PART/CONDITION</b>	<b>DESCRIPTION OF REVISIONS</b>	<b>DATE(S) REQUESTED</b>
Attachment 1 Waste Analysis Plan	Waste Analysis Plan revised to: 1) reflect use of a new computer based waste characterization system used throughout Dow North America that provides a printable version of the Generator Waste Characterization Form (GWCF); 2) to allow for qualified personnel other than Dow Environmental Operations personnel to carry out waste characterization duties; and 3) make minor revisions to Land Disposal Restriction requirements. Revised example GWCF also included in attachment.	9/12/05
Attachment 2 Inspection Schedule	Inspection forms updated pursuant to Condition II.L.9 incorporated into attachment as follows: 1) forms submitted February 27, 2004 (Waste Storage Area I), effective March 12, 2004; 2) forms submitted May 18, 2004 (703/830/32 Incinerators and Ancillary Equipment, 830 Container Storage, Incinerator Tank Farm and 33 Building), effective June 1, 2004; and 3) forms submitted September 14, 2005 (RGIS), effective September 30, 2005.	2/27/04 5/18/04 9/14/05
Attachment 4 Contingency Plan	Revised to 1) reflect annual update changes to Emergency Coordinators, etc.; 2) include Contingency Plan requirements for the Sludge Dewatering Facility Post-Closure Plan (previously in Attachment 23); and 3) voluntarily include Rockwell Road Landfill as part of the Facility Contingency Plan. Complete replacement of attachment, except Drawing B2-403-927122.	8/8/05
Attachment 5 Closure Plan	Previously approved Partial Closure Plan for 703 and 830 Incinerators, Rev. 2, dated August 2004, including revised Fugitive Dust Control Plan for Incinerator Closure, Rev. 1, dated July 2004, incorporated into attachment (Operating License Amendment 2 on September 2, 2004).	DEQ Initiated Update
Attachment 7 Facility Boundary Topographic and Part A Maps and Waste Storage Area I Drawings	Updated Facility Part A Map with more current information on nearby residential wells and Waste Storage Area I drawings that show alternate container storage configuration and drainage improvements incorporated into attachment.	7/19/04 8/16/04 3/7/05
Attachment 10 Tank System Drawings	33 Building Tank System as-built drawings incorporated into attachment.	6/19/03 3/2/05
Attachment 11 Tank System Process Information, Including Spill and Overfill Prevention Procedures	33 Building Tank System Certification incorporated into attachment.	6/19/03

<b>OPERATING LICENSE PART/CONDITION</b>	<b>DESCRIPTION OF REVISIONS</b>	<b>DATE(S) REQUESTED</b>
Attachment 12 1989 Incineration Complex Operating License and Modifications	Deleted due to closure of 703 and 830 Incinerators.	9/30/03
Attachment 13 32 Incinerator Container Storage Drawings	32 Incinerator Container Storage as-built drawings incorporated into attachment.	6/19/03 6/30/03 7/7/03 8/30/04 12/13/04
Attachment 14 32 Incinerator Detailed Engineering and Process Information	32 Incinerator Detailed Engineering and Process Information updated to allow use of alternate existing burner nozzles LS 2030 and 2040 for Dino unloading and incorporated into attachment.	8/30/04
Attachment 16 32 Incinerator Tank System Storage Drawings	32 Incinerator Tank System Storage as-built drawings incorporated into attachment.	6/19/03 6/30/04 7/7/03 12/13/04
Attachment 17 32 Incinerator Drawings	32 Incinerator as-built drawings incorporated into attachment.	6/19/03 6/30/04 7/7/03 12/13/04
Attachment 18 Tertiary Pond Drawing and Process Information	Previously approved Tertiary Pond Plan View drawing incorporated into attachment (Operating License Amendment 1 on September 30, 2003).	DEQ Initiated Update
Attachment 23 Post-Closure Plan for Sludge Dewatering Facility	Post-Closure Plan for Sludge Dewatering Facility updated to reference facility Contingency Plan and Sampling and Analysis Plan rather than directly including this information in Attachment 23. Complete replacement of attachment.	9/9/05
Attachment 24 Groundwater Monitoring Program Sampling and Analysis Plan	Groundwater Monitoring Program Sampling and Analysis Plan updated to revise field and analytical procedures and to add Compliance Schedule environmental monitoring activities. Complete replacement of attachment.	4/15/05
Attachment 25 Environmental Monitoring Tables and Figures	Updated Table of Contents cover page. Deleted Table XVIII.1 as a result of updating the Post-Closure Plan for Sludge Dewatering Facility (Attachment 23). For consistency, monitoring parameters for the Sludge Dewatering Facility were consolidated into Table 2 of the Groundwater Monitoring Program Sampling and Analysis Plan (Attachment 24).	9/9/05

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Attachment 26 Ambient Air Monitoring Program	Ambient Air Monitoring Program updated to: 1) revise due date for reporting from 45 days to 60 days after the end of the quarter to allow for quality assurance/quality control review and for consistency with due dates for other environmental monitoring reporting, and 2) reflect the relocation of the upwind monitoring station. Revised portion replaced in attachment.	1/8/04 12/13/04
Attachment 27 Soil and Groundwater Exposure Control Program	Updated Facility Fugitive Dust Control Program incorporated into Soil and Groundwater Exposure Control Program.	3/11/04 7/29/05 8/22/05 9/23/05
Attachment 28 Compliance Schedule	Compliance Schedule for Environmental Monitoring and Corrective Action for Units Other Than the 32 Incinerator updated to reflect progress on Midland Plant corrective action activities and modification of due dates. Complete replacement of attachment.	3/30/05
Attachment 29 32 Incinerator Schedule of Compliance Due Dates	Deleted due to completion of 32 Incinerator construction and compliance activities (e.g., submittal of as-built incinerator, container storage and tank system drawings and certifications, comprehensive incinerator performance testing).	3/10/05