



The Dow Chemical Company
Midland, Michigan 48667
USA

MICHIGAN OPERATIONS
May 11, 2016

CERTIFIED MAIL
7011 0470 4482 8866

Bryce Feighner, Chief
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
P.O. Box 30241
Lansing, MI 48909

cc: Dan Daily, MDEQ-OWMRP, P.O. Box 30241, Lansing, MI 48909
Trisha Confer, MDEQ-OWMRP, 401 Ketchum St, Suite B, Bay City, MI 48708

RE: THE DOW CHEMICAL COMPANY – MID 000 724 724
MINOR MODIFICATION REQUEST FOR
REPLACEMENT OF EXISTING PIEZOMETER

In accordance with R 299.9519(5) of the administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of NREPA, 1994 PA 451, as amended, The Dow Chemical Company(Dow) is requesting approval of a minor modification to the Operating License to replace an existing functional piezometer with a new piezometer to facilitate a plant expansion project.

Existing piezometer 3391 is included in the facility shallow groundwater hydraulic monitoring program outlined in License Condition IX.E.3. The existing piezometer is located directly adjacent to a production facility that needs to expand, and the existing piezometer needs to be abandoned to accommodate construction of a concrete foundation. Prior written approval via a minor modification to the Operating License is required pursuant to Condition IX.B.1.(h) for this change.

The proposed activities associated with this request include: abandonment of existing piezometer 3391 by plugging the casing with neat cement, consistent with the procedures outlined in Appendix K of Attachment 15 of the Operating License; and piezometer 3391 will be replaced in the facility shallow hydraulic groundwater monitoring program with piezometer 9056, installed on April 29, 2016, approximately two hundred feet to the north of piezometer 3391. Upon approval, Table 2-K and Figure 11 of the Midland Plant Sampling and Analysis Plan will be updated to reflect the new piezometer information and location.

If you have any questions regarding this request, please contact Marty Crook (989) 638-9552.


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