

**FORM EQP 5111 ATTACHMENT TEMPLATE A7  
CONTINGENCY PLAN**

This document is an attachment to the Michigan Department of Environmental Quality's (DEQ) *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9501, R 299.9508(1)(b), R 299.9504(1)(c), R 299.9521(3)(b), R 299.9607, and Title 40 of the Code of Federal Regulations (CFR) §§264.50 through 264.56, and 270.14(b)(7), establish requirements for contingency plans at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003. This license application template addresses requirements for a contingency plan at the hazardous waste management facility for the Dow Michigan Operations Midland Plant & Salzbürg Landfill in Midland, Michigan. It is recommended that Dow Michigan Operations Midland Plant & Salzbürg Landfill perform annual drill exercises with the local fire department and emergency responders using the contingency plan to make sure all staff are familiar with the plan and determine whether the plan needs any updating.

(Check as appropriate)

- Applicant for Operating License for Existing Facility
- Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

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## INTRODUCTION

### A7.A BACKGROUND INFORMATION

#### A7.A.1 Purpose of the Contingency Plan [R 299.9607 and 40 CFR §§264.51 and 264.53]

This Contingency Plan has been prepared in accordance with the requirements of 40 CFR, Part 264, Subpart D, and R 299.9607. It is designed to establish the necessary planned procedures to be followed in the event of an emergency situation at the Dow Michigan Operations Midland Plant & Salzbürg Landfill facilities in Midland, Michigan, such as a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water.

Copies of the Contingency Plan have been provided to emergency response agencies in order to familiarize them with the facility layout, the properties of the materials handled, locations of the working areas, access routes into and within the facilities, possible evacuation routes from the facilities, and types of injuries or illness that could result from releases of materials at the facilities. See Attachment A7.1, Documentation of Arrangements with Local Authorities, which includes documentation that each of these agencies has received a copy of the Contingency Plan. Whenever the Contingency Plan is modified, the facility will provide the agencies with a copy of the modified plan.

**A7.A.2 Description of Facility Operations**

The intent of 40 CFR 264, Subpart D (Contingency Plan and Emergency Procedures) of the Resource Conservation and Recovery Act (RCRA) is to ensure that facilities that treat, store, or dispose of hazardous wastes have established the necessary planned procedures to follow in the event an emergency situation should arise. The purpose of the Emergency Action Plan (EAP), Attachment A7.5, is to reduce the risk of human life loss and injury and minimize property damage during an unusual or emergency event at The Dow Chemical's (Dow's) Tertiary Pond and No. 6 Brine Pond, Midland, MI. The Tertiary Pond (T-Pond) and the No. 6 Brine Pond (Brine Pond) are classified as Dams under Part 315, The Dam Safety Program, of Act 451, as amended.

This Contingency Plan is for the Michigan Operations Midland Plant and Salzburg Landfill RCRA Facilities. This includes the following areas:

<b>Name of Area</b>	<b>RCRA</b>	<b>Waste Type Handled</b>
Waste Storage Area I (1143 Building)	Container Storage	Containerized liquid wastes (e.g., flammable/combustible, corrosive)
33 Building	Tank Storage	Bulk solids (e.g., incinerator ash, contaminated soils, wastewater treatment plant solids)
1163 Building	Tank Storage	Bulk solids (e.g., incinerator ash, contaminated soils, wastewater treatment plant solids)
Tertiary Pond <sup>1</sup>	Secondary Wastewater Effluent	Wastewater
Incineration Complex	32 Rotary Kiln	Solids, liquids & gases
	32 Building Container Storage	Packaged wastes (i.e., packs and drums of solid & liquid wastes)
	830 Building Container Storage	Packaged wastes (i.e., packs and drums of solid & liquid wastes)
	Incinerator Tank Farm Storage	Liquid wastes (e.g., flammable/combustible, corrosive)
	Incinerator Unloading Spots	Containerized liquid wastes (e.g., flammable/combustible, corrosive)
Staging Pile/Corrective Action Management Unit (CAMU)	Remediation Waste Storage	Contaminated media (e.g., soil, water, sediment) and debris
Closed Units under Post-Closure Care	Sludge Dewatering Facility	N/A – closed unit

Name of Area	RCRA	Waste Type Handled
Waste Management Units under Corrective Action	LEL I, II, III	N/A – closed unit
	Poseyville Landfill	N/A – closed unit
	1925 Landfill	N/A – closed unit
	Wastewater Conduits	N/A – closed unit
	Diversion Basin	N/A – closed unit
	Facility SWMU	Solids, liquids & gases
	No. 6 Brine Pond <sup>2</sup>	Water
Salzburg Landfill	Landfill Disposal	Incinerator ash, contaminated soils and debris, and process wastes

<sup>1</sup> Part 315 Dam ID No. 2676

<sup>2</sup> Part 315 Dam ID No. 2675

This Plan includes transportation of waste from on-site generators to the Incineration Complex, Salzburg Landfill or licensed storage areas. See attached drawings B2-010-927122 & B2-106-1374 for the locations of all waste management units covered by this plan.

On-site generators that store hazardous waste for less than 90 days have separate Contingency Plans as required by 40 CFR 265 Subparts C and D.

The Treatment, Storage and Disposal Units are operated by the Environmental Operations Department under the supervision of the Production Leader of Environmental Operations, located in 34 Building. The Waste Management Units under Corrective Action and the Closed Units under Post-Closure Care are maintained by the Environmental Remediation and Restoration Department under the Remediation Leader located in 1790 Building.

### **A7.A.3 Identification of Potential Situations**

The provisions of this plan will be carried out whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, (or in the cases of the Tertiary Pond or No. 6 Brine Pond, a dam/dike failure), that could threaten human health or the environment.

**A7.B EMERGENCY COORDINATORS**

[R 299.9607 and 40 CFR §§264.52 and 264.55]

**A7.B.1 Identification of Primary and Alternate Emergency Coordinators**

[R 299.9607 and 40 CFR §§264.52 and 264.55]

At all times there is at least one employee, either on the facility premises or on-call and within reasonable travel distance of the facilities, with the responsibility for coordinating all emergency response measures. The list of Environmental Operations employees designated as Facility Emergency Coordinator (FEC) is contained in Attachment A7.4. This list gives all Environmental Operations persons qualified to act as the FEC. The personnel on this list work on a rotation schedule that is subject to change.

If an incident occurs at either the Michigan Operations Midland Plant or Salzbürg Landfill RCRA Facility, call the Head Operator who will contact the Environmental Operations Supervisor on-call. If the incident requires that the Contingency Plan be activated, the Supervisor on-call will serve as the FEC.

Name	Address & Home Phone	Work Phone
Head Operator	See FEC List (Attachment A7.4)	989-638-1928

**A7.B.1(a) Site Emergency Action Organization**

The Site Emergency Action Organization is available on a 24 hour continuous basis to meet site emergencies. The Site Emergency Action Organization is activated by calling 1-2-3 on any plant telephone. The Site Emergency Action Organization consists of the following individuals and groups:

- Site Emergency Manager (SEM)
- Site Emergency Representative (SER)
- Emergency Services & Security (ES&S) Team
- Incident Commander
- Environment, Health & Safety (EH&S) On-Call (Reporting)
- EH&S On-Call (Response)
- ES&S Monitoring On-Call
- ES&S Site On-Call
- Distribution Emergency Response
- Reactive Chemical Role
- Public Affairs
- Dispatch Center
- Midland Area Health Services
- Site Responsible Care Leader (RCL)

The roles and capabilities of these individuals and groups are described in the Midland Site Emergency Plan.

**A7.B.2 Qualifications of the Emergency Coordinators**  
[R 299.9607 and 40 CFR §264.55]

RCRA requires facility personnel to successfully complete a program of classroom or computer-based instruction or on-the-job training that teaches them to perform their duties in a way that supports the facility's compliance with the requirements of hazardous waste management. Dow's training program is directed toward personnel working in areas that may generate hazardous wastes as a result of operations or who may have direct responsibility for managing hazardous wastes.

Dow's hazardous waste training is designed to provide employees with proper waste handling and emergency procedures to enable them to perform assigned duties and functions in a safe manner. The training program includes instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the position(s) in which they are employed. The training program is designed to provide knowledge so that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- Key parameters for automatic waste feed cut-off systems;
- Communications or alarm systems;
- Response to fires, explosions, or releases;
- Response to groundwater contamination incidents; and
- Shutdown of operations.

**A7.B.3 Authority to Commit Resources**  
[R 299.9607 and 40 CFR §264.55]

The FEC role may often be filled by the facility Immediate Response Leader (IRL), Environmental Operations Supervisor on-call, EH&S On-call or other trained individuals at Dow and has the authority to commit all the resources required to implement the Contingency Plan.

**A7.C IMPLEMENTATION OF THE CONTINGENCY PLAN**  
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The FEC must be contacted immediately in the occurrence of any situation that may result in potential or actual threats to human health or the environment. The FEC must implement this plan whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, (or in the cases of the Tertiary Pond or No. 6 Brine Pond, a dam/dike failure), that could threaten human health or the environment.

The following situations are provided as guidance for the conditions or circumstances under which the plan must be implemented:

**A. Waste Storage Area I (1143 Building and Lot)**

1. A fire or explosion in the containerized waste storage area.
2. Spills that could reach the Tittabawassee River.
3. An explosion that damages or destroys the facility.

4. Vapor releases which are likely to harm human health or the environment outside the facility.
5. Spills that reach the ground and are not contained.

**B. 1163 Building and 33 Building**

1. Fire in the tank area.
2. An explosion that damages or destroys the facility.
3. Spills which could reach the Tittabawassee River.
4. Vapor releases which are likely to harm human health or the environment outside the facility.
5. Spills that reach the ground and are not contained.

**C. Tertiary Pond**

1. A spill from this facility which could reach the Tittabawassee River.
2. The impoundment leaks which would be characterized by a dam/dike wall failure, or a sudden unexplained level drop.

**D. Incineration Complex (includes unloading spots, tank farm, 32 Building & 830 Building Container Storage)**

1. A fire or explosion in the tank farm involving one or more of the waste liquid storage tank systems containing hazardous waste that may impact human health or the environment.
2. A fire or explosion in a containerized waste storage area involving hazardous waste that may impact human health or the environment (the containerized waste storage area does not include the pack conveyer air lock into the kiln).
3. A fire or explosion at the incinerator resulting in a significant release of hazardous waste or hazardous waste constituents.
4. Spills which could reach the Tittabawassee River.
5. Spills which may create a vapor explosion hazard beyond the immediate area of the spill or involving other facilities.
6. Spills that reach the ground and are not contained.
7. Vapor releases which may harm human health or the environment outside the facility.

**E. Closed Units, Waste Management Units and Staging Pile/CAMU (located in closed Diversion Basin)**

1. A fire or explosion in the facility area which could threaten human health or the environment.
2. A release of hazardous waste or hazardous constituents that occurs in a location at the facility where the release:
  - a. cannot be collected or contained, or
  - b. has the potential to reach the Tittabawassee River.
3. No. 6 Brine Pond impoundment leak which would be characterized by a dam/dike wall failure, or a sudden unexplained level drop.

**F. Waste Transfer to the Incineration Complex, Salzburg Landfill or Licensed Storage**

1. A fire or explosion in the facility area which could threaten human health or the environment.
2. Spills which could reach the Tittabawassee River.

3. Spills which may create a vapor explosion hazard beyond the immediate area of the spill or involving other operations.
4. Spills that reach the ground and are not contained.
5. Vapor releases which may harm human health or the environment outside the facility.

#### G. Salzburg Landfill

1. A fire in the undeveloped facility area which could threaten human health or the environment.
2. A fire or explosion in the landfill cells which could threaten human health or the environment.
3. A spill of hazardous waste that occurs outside an active landfill cell area and in a location at the facility where the spill cannot be collected or contained, or has the potential to contact the perimeter runoff ditch system.
4. Significant concentrations of indicator compounds are detected in either the liner failure detection system or groundwater monitoring wells.

In any of these cases, Incident Command will establish a command post at a suitable location based on the situation for oversight of the incident and implementation of the Contingency Plan.

The Contingency Plan may be halted at any point during its implementation if it is determined that the situation is under control and no threat to human health or the environment exists. A decision to cease implementation of the Contingency Plan does not alter or affect Dow's obligation to otherwise properly manage any released hazardous waste or hazardous waste constituents.

Examples of situations that will not require implementation of the Contingency Plan are listed below (not intended to be all-inclusive):

1. Fire or explosion which occurs as part of the incineration treatment process within the rotary kiln or secondary combustion chamber (SCC) of the incinerator, which causes no damage to the facility and results in no unlicensed/unpermitted releases to the environment.
2. Minor spills that are contained within secondary containment and/or have no potential impact to human health or the environment.
3. Spills or exposures of de minimus quantities from the following activities: loading or unloading stations, failure of transfer lines, leaking valves, pump seal failures, and other normal operation or maintenance activities.

#### **A7.D EMERGENCY PROCEDURES**

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The following general procedures have been established for implementation by facility personnel and the FEC in order to efficiently respond to the release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

##### A. General

Upon discovering an emergency or an imminent emergency, personnel will notify all operations and service people in the area using the area alert sirens, the intercom system, or radio communication in the event the alert sirens are disabled. The Supervisor on-call will be notified

that the emergency exists. The Dow ES&S Department will be notified that an emergency exists and resources will be dispatched to the site as necessary at the discretion of ES&S or the FEC.

Dow ES&S and the Dow Fire Department are located directly across the street from the Environmental Operations Department making the storage location of sufficient and adequate emergency equipment immediately available. The equipment available is listed in detail in Attachment A7.3 of this Contingency Plan. Given the long list of equipment, all of the testing and maintenance procedures are not listed. The procedures are available for inspection upon request.

The FEC will implement the Contingency Plan by notifying the Dow ES&S Department to call the emergency contacts and request assistance and by initiating appropriate calls to governmental agencies.

The FEC will determine that all personnel in the area are accounted for and that emergency aid is available. The FEC will then determine the identity, source, and amount of material involved and the area affected by the emergency. The FEC will then assess the impact to human health and to the environment, and direct actions to be taken as necessary to minimize the effects of the emergency and bring the situation under control as quickly as possible.

When the situation is under control, the FEC will direct containment and cleanup efforts to bring the situation to a safe conclusion.

#### B. Action Steps to Be Performed During Contingency Plan Implementation

The specific steps involved when implementing the Contingency Plan are:

1. Alarm or report by the person discovering an emergency to Dow ES&S and the Supervisor at the facility or on-call. *It should be noted that merely sounding the alarm does not mean that the Contingency Plan has been activated. This decision is consciously made by the FEC. The person discovering the emergency may communicate the emergency by activating a siren, or by calling on the phone or radio. Sirens are activated by using switches located throughout the facility. Phones are also located throughout the facility. Areas may have flashing lights that may be activated to keep personnel from entering the area.*
2. Dow ES&S activates internal alert system inside the site if necessary. The internal alert system can consist of blue warning lights at selected high traffic areas or site-wide communications through the alert system.
3. FEC decides if Contingency Plan implementation is necessary and directs ES&S to call contacts for assistance as needed. Contacts are listed in this plan, and include the appropriate governmental officials.
4. Further additional waste treatment, storage, or disposal activities in or at the affected area are halted until normal operations are restored.
5. If the emergency has or could impact human health or the environment outside the facility, the appropriate local government authorities and/or the designated governmental on-scene coordinator are notified.
6. FEC directs response procedures to contain the emergency.
7. If cleanup operations are necessary, FEC ensures that material is recovered, if possible, and packaged for treatment and/or disposal. If necessary, the FEC will request outside cleanup assistance from HAZWOPER-trained contract companies.

8. The FEC ensures that the emergency equipment used has been readied for re-use and that no waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are complete.

~~9. The FEC must notify the EPA Region V Administrator, MDEQ and local officials that the facility is in compliance with the items listed in #8 above before resumption of normal operations.~~

~~10.9.~~ Note in the operating record, the date, time and details of the incident which required implementation of the Contingency Plan.

~~11.10.~~ Provide written follow-up within 15 days after the incident to the Chief of the MDEQ Office of Waste Management and Radiological Protection. The report must include those items listed in 40 CFR 264.56(i).

### Contingency Plan Action Steps

1. Alarm or report by person discovering emergency
2. Notify Dow ES&S by two-way radio or by dialing 636-4400 or by dialing 1-2-3 on a Dow phone
3. Notify Facility Emergency Coordinator (FEC)
4. Notify as needed:
  - a) Dow Fire Department
  - b) Site Emergency Manager
  - c) Site Emergency Representative
  - d) Dow Medical
  - e) EH&S On-call
  - f) Site Responsible Care Leader
  - g) Remediation Leader
  - h) Dow Utilities Distribution
  - i) Dow Industrial Hygiene
  - j) City Police & Sheriff
  - k) City Fire Department
  - l) MidMichigan Medical Center
  - m) County Health Department
  - n) City Water Department
  - o) Consumers Energy
  - p) County Emergency Services (Local Emergency Planning Committee (LEPC))
  - q) Dam Safety Program (517) 284-5567 8am to 5 pm, other hrs PEAS (800) 292-4706 for Tertiary or No. 6 Brine Pond Dam/Dike failures
5. Determine need to implement Contingency Plan (contact the RCRA Subject Matter Expert, if needed)
6. Initiate contact with governmental agencies. Immediate notification is required for fire or explosion at the kiln or greater than de minimus spills, whether or not the Contingency Plan is implemented (during normal business hours to MDEQ-OWMRP Chief, otherwise PEAS)
7. Manage any steps to eliminate the emergency
8. Manage cleanup of the area and equipment
9. Note date, time and details in Operating Record
10. Provide written follow-up within 15 days to ~~EPA~~/MDEQ.

C. Tertiary Pond or No. 6 Brine Pond Impoundment Leakage (40 CFR 264.227)

The impoundment will be removed from service should the level suddenly drop unexpectedly or when a leak in the dike occurs which could adversely affect human health and the environment, which cannot be repaired while the impoundment is still in service. In this case, the following procedures will be implemented:

1. Inflow to the impoundment will be stopped immediately and the treated wastewater will be discharged in accordance with the provisions of the NPDES Discharge Permit MI #0000868.
2. Leakage will be collected by implementing one or more of the following:
  - a. Spreading a suitable absorbent on the leakage.
  - b. Constructing a temporary dike from appropriate material upstream or downstream of the direction of flow.
  - c. Constructing an intercept trench downstream of the direction of flow and installing a pump for transferring the leakage.
  - d. Constructing a plastic lined pit to intercept and temporarily collect the leakage.

Any leakage collected during the above operations will either be placed into tanks or containers for further treatment or disposal, or will be returned into the impoundment.

3. Once the leak is under control, additional measures will be taken as necessary to repair the dike or impoundment. One or more of the following will be implemented:
  - a. Install additional clay and/or plastic film over the suspect area (this may be possible without completely removing the impoundment from service).
  - b. Install a grout curtain into the suspect area by using well or access borings.
  - c. Construct a temporary dike inside or outside of the impoundment in the trouble area.
  - d. Construct a cofferdam using an earthen dam approach or by driving sheet piling inside the impoundment around the trouble area to allow repairs to be made on the dike itself.
  - e. Other repair solution(s) approved by the Dam Safety department of the MDEQ's Water Resources Division.
4. If a leak cannot be stopped by any other means, the impoundment will be emptied as needed.

The MDEQ will be notified of the leak within seven days.

5. In the event that the impoundment has been removed from service because of actual or imminent dike failure, the repaired portion will be re-certified by a qualified engineer as meeting the approved specifications in the facility permit. This re-certification will be performed internally by a qualified Dow engineer or through an outside service that would provide a qualified engineer.
  - a. In the event that a sudden unexplained drop in the Tertiary Pond Impoundment liquid level has occurred and it has been necessary to remove the facility from service, procedures will be undertaken to install a liner in accordance with 40 CFR 264.221(a) or 264.222.
6. In addition, ~~Dow will notify the MDEQ-OWMRP Chief~~ prior to resuming operations in the affected area(s), ~~Dow will ensure~~ and that the proper cleanup procedures have been implemented and all emergency equipment ~~has been~~ cleaned and ~~is~~ fit for re-use.
7. The specific procedures for leaks or breaches of the dams/dikes are contained in Attachment A7.5 – Part 315 Dam Safety Emergency Action Plan.

**A7.D.1 Immediate Notification Procedures for Facility Personnel and State and Local Agencies with Designated Response Roles**  
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

**1. Internal Contacts**

The FEC or his/her designee calls Dow ES&S, 636-4400, to initiate contact with any of the following applicable departments, as necessary. Dow EH&S On-call person is responsible to contact the people filling the following roles as needed. Dow ES&S has the current contact numbers for these people. In some cases, a group pager is activated which contacts multiple people with one call.

- Dow Fire Department, if applicable
- EH&S On-Call person, if applicable
- Site Emergency Manager, if applicable
- Utilities Distribution, if applicable
- Site Responsible Care Leader, if applicable
- Remediation Leader, if applicable
- Dow Medical Department, if applicable
- Delivery Leader/Specialist, if applicable

**2. External Contacts**

The EH&S On-Call person, or his/her designee (FEC), may contact the following, as needed:

- Michigan Department of Environmental Quality (PEAS) - 800-292-4706
- EPA National Response Center (NRC) - 800-424-8802
- U.S. Coast Guard, Detroit - 313-568-9470
- U.S. Environmental Protection Agency - 313-676-6500
- MDEQ-OWMRP, Chief, Lansing – 517-284-6551
- MDEQ-OWMRP, District Office – 989-894-6200
- MDEQ Dam Safety Program 8am to 5pm 517-284-5567, after hours call PEAS

When notifying state, local, and if necessary, federal authorities, the following information will be provided:

- Caller's name and telephone number
- Name and address of facility
- Facility EPA Identification Number
- Time and type of incident (e.g., release, fire)
- Name and quantity of material(s) involved, to extent known
- The extent of injuries, if any
- The possible hazards to human health, or the environment, outside the facility.
- Weather conditions (wind direction and speed), if a vapor is involved
- The approximate area of affected location

Dow ES&S may call the following, if appropriate:

- Midland City Police Department - 911
- Midland County Sheriff Department - 911
- Michigan State Police, Tri-City Post No. 31 - 989-495-5555
- Mid-Michigan Medical Center - 989-839-3100 (Emergency Dept)
- Midland City Utilities Department (Water Emergencies) - 989-837-3515
- Midland City Utilities Department (Sewer Emergencies) – 989-837-3500

- Midland County Emergency Services (LEPC) - 989-832-6750
- Midland City Fire Department - 911
- Midland County Health Department - 989-832-6380
- Consumers Energy - 800-477-5050

**A7.D.2 Procedures to Be Used for Identification of Releases**  
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The FEC will identify the character, source, amount and extent of any released hazardous waste or hazardous waste constituents. The amount may be estimated based on the capacity of the particular source and the last inventory for that source. Unit inventories, receipts (i.e., bill of lading or uniform hazardous waste manifest), the waste characterization on file, operating logs, engineering drawings, or the waste generator may be used to identify the hazardous waste or hazardous waste constituents involved.

**A7.D.3 Procedures to Be Used to Assess Potential Hazards to Human Health and the Environment**  
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

The emergency coordinator will assess possible hazards, both direct and indirect, to human health or the environment that may result from a release, fire, or explosion.

The FEC may use the waste characterization information, information on health effects of the chemical(s) involved, information on environmental impacts of the chemical(s) involved, input from Expertise Centers (e.g., Reactive Chemicals, Industrial Hygiene, EH&S On-call, etc.), the expected duration of the emergency, and meteorological information to assess the impact of the emergency. Action will be taken, based on this assessment, to contain and mitigate the potential impact of the emergency. Additional action may be taken, as deemed necessary, to evacuate downwind areas or notify outside agencies of such other actions as may be necessary to protect human health and the environment.

The assessment will consider the effects of any gases that may be generated, surface runoff from water or chemical reagents used to control fires, and any chemical or physical reactions with equipment or structures.

**A7.D.4 Procedures to Determine if Evacuation Is Necessary and Immediate Notification of Michigan Pollution Emergency Alerting System and the National Response Center**  
[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

If the FEC's assessment indicates that evacuation of facility areas may be advisable, he will implement the evacuation plan for the facility. The facilities employ a siren system that rises and falls in pitch continuously to initiate evacuation. In addition to the alarm, a two-way radio system is used to notify key plant personnel of the nature of the emergency and recommended plan of action. If the FEC determines that the event could also impact areas outside the facility they will make the appropriate notifications as described in Section A7.F, Procedures for Assessing Offsite Risk During and After a Fire/Explosion Incident or Significant Release, below.

The facility's evacuation plan is included in this Contingency Plan as Attachment A7.2.

**A7.D.5 Procedures to Be Used to Ensure that Fires, Explosions, and Releases Do Not Occur, Reoccur, or Spread During the Emergency**

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(e), 264.227, and 264.200]

Whenever there is an imminent or actual emergency situation where the potential or actual release of hazardous waste or hazardous waste constituents may threaten human health or the environment, the facility will implement the following procedures:

1. Fire/Explosions

In the event of a fire or explosion, the fire will first be contained to prevent spreading and then extinguished. Initial response will be conducted by facility personnel only if safe to do so. Any additional response will be conducted by ES&S. Containment of the fire will be accomplished by identifying the potential spread pathways such as connecting pipelines or electrical traceways. Any valving in pipes or conduits containing potentially ignitable wastes or materials will be closed and isolated if possible. In addition, these areas, the electrical traceways and the areas downwind, may be blanketed with fire fighting foam or other fire suppression materials to deprive the ignition source of oxygen and to keep any potentially ignitable materials at temperatures well below the auto-ignition temperatures.

Also, should it appear that neighboring containers or tanks containing potentially ignitable materials could be impacted, and if considered to be an appropriate, safe action in the opinion of the Dow Fire Chief, the containers or the contents of the containers or tanks may be temporarily moved to an alternate location.

In the event of an explosion with secondary fires, the fires will be contained and extinguished, and the area contaminated by debris from the explosion will be barricaded and traffic restricted until the debris is collected and the area decontaminated.

If the Dow Fire Chief determines that additional firefighting resources are needed they will contact the City of Midland Fire Department as described in Attachment A7.1: Documentation of Arrangements with Local Authorities.

2. Spills/Material Releases

These emergencies that require implementation of the Contingency Plan will be controlled by erecting barricades, then intercepting and collecting the spilled material to minimize the affected area.

A spill from a tank, portable container or pack will be contained by spreading appropriate material to contain the spill and prevent spreading. The appropriate absorbent for the waste may be determined by consulting the waste characterization for that material. The liquid portion of the spilled material will then be collected into tanks or available containers. The solid portion will be collected in containers.

In the event of a release of material which creates a vapor explosion hazard or which is likely to cause odor complaints from outside the facility, the spill will be contained and blanketed with foam or liquid, or otherwise managed, to minimize the evolution of flammable vapors or odors.

### 3. Large Rain Events

Stormwater-related emergencies that require implementation of the Contingency Plan will be controlled by monitoring of the facility rain gauges, the proactive staging and use of portable pumps for storm water/leachate management, and having employees or on-call contractors available to respond in a timely manner to mitigate the event.

An imminent release of storm water/leachate from an active landfill cell will be contained by plugging any affected outfalls to contain the release and prevent spreading. The liquid portion of the released storm water/leachate will then be collected into tanks or available containers or pumped into the Michigan Operations Salzburg Landfill sewer system and treated in the Midland Plant's NPDES-permitted wastewater treatment facilities. The solid portion will be collected in containers and appropriately managed.

During an emergency, the FEC must take all reasonable measures necessary to ensure that fires, explosions, or releases do not recur or spread to other areas of the facility, or off site. Actions that may be employed are described above. Where applicable, these procedures include stopping processes and operations.

Before normal operational activities are resumed under these circumstances, the FEC, in consultation with any other appropriate facility supervision, fire, safety or loss prevention personnel, will inspect the area to assure that the potential of the incident recurring has been minimized.

Attachment A7.3 is a detailed description of the type, amount, and location of all emergency equipment at the Michigan Operations Midland Plant and Salzburg Landfill facilities.

#### **A7.D.6 Procedures to Be Used to Monitor Equipment Should Facility Operations Cease**

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(f)]

Dow will monitor for leaks, pressure buildup, gas generation or ruptures using handheld and/or computer-based monitoring if operations at the facility are stopped in response to a fire, release or explosion. Any monitoring will only be performed if it is appropriate and can be done safely.

#### **A7.D.7 Procedures to Provide Proper Treatment, Storage, and Disposal for Any Released Materials**

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(g)]

The liquid portion of any spill will be collected into tanks or containers. The solid portion will be collected in containers. If a spill is from a pack, an overpack container may be used and the overpack container will be handled appropriately depending on the waste (e.g., incineration, etc.). Any collected spill materials will be properly managed in accordance with operating license requirements.

#### **A7.D.8 Procedures for Cleanup and Decontamination**

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(h)]

Liquid wastes falling within contained areas will be collected using vacuum trucks or by pumping into tanks or containers and managed appropriately. Water runoff from fire fighting or spill

situations which are relatively clean and which would normally be allowed to be diverted away from the facility will be allowed to flow into the Michigan Operations Midland Plant's sewer system and treated in the plant's NPDES-permitted wastewater treatment facilities.

Spills, leaks, or water run-off from fire fighting activities containing significant amounts of organic liquids and which cannot be positively controlled using existing structures (such as diking systems) or other equipment, will be controlled and cleaned up. Cleanup materials from any release, fire or explosion shall be characterized, stored and treated within the facility following the normal procedures for these activities.

Solid waste material is evaluated under Land Disposal Restrictions and either put into the Salzburg Landfill or placed into containers for further treatment and/or disposal. Metal resulting from demolition required as a result of emergency situation will be cleaned and recycled as scrap metal.

Water used to wash emergency equipment will be collected in the Michigan Operations Midland Plant's sewer system and treated in the plant's NPDES – permitted wastewater treatment facilities.

#### **A7.E NOTIFICATION AND RECORD KEEPING REQUIREMENTS**

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(i)]

The following subsections identify procedures that must be followed to meet the notification and record keeping requirements.

##### **A7.E.1 Procedures to Be Used ~~to Notify State and Federal Officials~~ Prior to ~~Commencement Resuming~~ of Operations**

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56]

~~Dow will notify the MDEQ OWMRP Chief p~~Prior to resuming operations in the affected area(s), ~~Dow will ensure~~and that the proper cleanup procedures have been implemented and all emergency equipment ~~has been~~is cleaned and is fit for re-use.

##### **A7.E.2 Record Keeping Requirements**

[R 299.9607 and 40 CFR §§264.51, 264.52, and 264.56(i)]

##### **A7.E.2(a) Operating Record**

In the event of an emergency situation that requires implementation of the Contingency Plan, the FEC or their designee will record in the operating record the time, date, and description of the event. The operating record is maintained by Environmental Operations and can be found at the following location: Dow Chemical, Michigan Operations, 34 Building, Midland, Michigan 48667.

##### **A7.E(2)(b) Written Incident Report**

As required by 40 CFR 264.56(i), any emergency event that requires implementing the plan is reported, in writing, within fifteen (15) days to the Chief of the DEQ-OWMRP. The report will include:

- Name, address and telephone number of owner/operator;
- Name, address, telephone number and site identification number of facility;

- Date, time and type of incident;
- Name and quantities of material(s) involved;
- Extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, where applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

Reports will be sent to:

- Chief, MDEQ-OWMRP, P.O. Box 30241 Lansing, MI 48909

In addition, if a Dam is involved:

- Dam Safety Engineer, Water Resources Division  
Michigan Department of Environmental Quality  
2100 West M-32  
Gaylord, MI 49735

#### **A7.F PROCEDURE FOR ASSESSING OFFSITE RISK DURING AND AFTER A FIRE/EXPLOSION INCIDENT OR SIGNIFICANT RELEASE**

[R 299.9521(3)(b) and R 299.9607 and 40 CFR §264.56(d)]

If at any time during or after a release, fire, or explosion, the FEC determines that the situation could threaten human health or the environment outside the facility, they will report the findings as follows:

- If the FEC's assessment indicates that evacuation of local areas may be advisable, they will immediately notify the appropriate local authorities. The FEC will be available to help local officials decide if evacuation is necessary, and
- The FEC will immediately notify either the government official designated as the on-scene coordinator for this geographical area or the National Response Center (800-424-8802) and the following information will be provided:
  1. The name and telephone number of the person who is reporting the incident.
  2. The name, address, telephone number, and site identification number of the facility.
  3. The name, address, and telephone number of the owner or operator.
  4. The date, time, and type of incident.
  5. The name and quantity of the material or materials involved and released.
  6. The extent of injuries, if any.
  7. The estimated quantity and disposition of recovered material that resulted from the incident, if any.
  8. An assessment of actual or potential hazards to human health or the environment.
  9. The immediate response action taken.

In addition, Dow will cooperate with DEQ staff in addressing the requirements of Office of Waste Management and Radiological Protection Policy and Procedure Number OWMRP-111-25 on Off-Site Corrective Action Procedures During and After Fire and/or Explosion Incidents at Hazardous Waste Management Facilities Licensed under Part 111 of the NREPA in the event that a significant Contingency Plan event resulting in the need for off-site corrective action procedures should occur.



**A7.G PROCEDURES FOR REVIEWING AND AMENDING THE CONTINGENCY PLAN**  
[R 299.9607 and 40 CFR §264.54]

The plan is reviewed and amended, if necessary, whenever:

1. The facility operating license is revised;
2. The plan fails in an emergency;
3. The facility changes in its design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for fires, explosions or releases of hazardous waste or hazardous waste constituents;
4. Changes in response are necessary for an emergency situation;
5. The list of emergency coordinators changes; or
6. The list of emergency equipment changes.

**Attachment A7.1:** Documentation of Arrangements with Local Authorities

Copies of the Contingency Plan are issued via certified mail to:

Director of Emergency Services  
Midland County Department of  
Emergency Services  
220 W. Ellsworth Street  
Midland, MI 48640

Medical Director  
Midland County Health Department  
220 W. Ellsworth Street  
Midland, MI 48640

Chief of Fire Department  
City of Midland  
816 E. Haley Street  
Midland, MI 48640

Chief  
MDEQ-OWMRP  
Constitution Hall  
525 West Allegan Street  
P.O. Box 30473  
Lansing, MI 48909

MDEQ-OWMRP  
Saginaw Bay District Office  
401 Ketchum Street, Suite B  
Bay City, MI 48708

Dam Safety Engineer  
Water Resources Division  
Michigan Department of Environmental  
Quality  
2100 West M-32  
Gaylord, MI 49735

Copies of certified-letter receipts from the local emergency support agencies are available upon request indicating receipt and acceptance of Dow's Contingency Plan.

**B. Police Support**

In an emergency involving this facility, Dow could request the support of local, county, or state police in the event that:

1. The emergency has the potential to impact the local community and evacuation of such potentially affected areas was necessary.
2. Numerous people gather at critical locations on the perimeter of Dow's facility and could be potentially in danger or pose a danger by restricting access to the facility for crucial response equipment, supplies, or personnel.
3. Specialized equipment materials or supplies are needed onsite and special route clearances or traffic control are required to expedite delivery of such materials, equipment, or supplies. In this case, police and sheriff departments will provide off site evacuation of affected portions of the community, barricading, traffic control, and/or possible escort for emergency activities.

**C. Medical Support**

Dow Chemical Michigan Operations has a full time medical staff including full time physicians, Emergency Medical Technicians (EMTs), and a trained nursing staff. Nurses, EMTs, and physicians are onsite or available on-call for emergencies 24 hours per day, 7 days per week.

In general, the Dow Medical Department will evaluate all injuries to personnel and visitors in Michigan Operations. Acute chemical exposures and minor (non-fractures or vital organ penetrating) cases can be treated in-house. Severe injuries or occupational illnesses that require

hospitalization or treatment by specialists are treated and transported to the MidMichigan Medical Center (MMMC).

Dow staff physicians are also full-time members of the Midland Hospital staff and have admitting privileges to the MMMC. In addition, the Dow Medical Department participates in training Dow EMTs, the Midland County Paramedics, and the Family Practice Residents in the MMMC.

Also, during practice emergency exercises, the Dow Medical staff coordinates closely with the MMMC to monitor and treat injuries or exposures.

Finally, should evacuation of the Dow Medical Facility be necessary, the staff would regroup and continue to coordinate medical support activities from the MMMC.

#### D. Medical Emergency Vehicles

The Michigan Operations, Midland location has two ambulances for transporting injured people to the Dow Medical Department or the MMMC. In addition, Midland County has paramedics and the MMMC has ambulances on call as needed.

#### E. Outside Fire Fighting Support

The Dow Fire Department is equipped and trained to handle all types of fires related to the operations including the facilities covered by this plan. Outside fire support, such as the Midland Fire Department, would be called upon only under circumstances where the Dow Fire Chief feels further fire fighting support is necessary and such outside fire departments are appropriately trained and equipped. Such situations could include fires that have or could spread to additional facilities within Michigan Operations, or fires that have or could spread to areas outside Dow property. In all cases, the decision by the Dow Fire Chief to call in outside fire fighting support would depend upon the nature of the fire and the Dow Fire Chief's knowledge of the capabilities and limitations of such other fire departments.

During practice emergency exercises, the Dow Fire Department works closely with the City of Midland Fire Department to monitor and evaluate fire fighting resources and responses to the practice emergency.

#### F. Procedures to Familiarize Local Outside Agencies with Contingency Plan

Any time the plan has been revised, Dow will re-issue a copy of the Contingency Plan to all local authorities listed in Item A, above.

Due to the complexity of the Michigan Operations site, local authorities are always escorted while on site. The escort provides information on a case-by-case basis. This information includes facility layout and chemical properties of involved materials (including hazardous waste properties). The escort determines a safe route to the involved site and escorts authorities along evacuation routes, if necessary.

## **Attachment A7.2: Evacuation Plan and Routes**

### **Evacuation Plans**

#### **A. General Procedures**

In the event of a major emergency, it may be necessary to evacuate a portion of the surrounding facility area. The FEC, or Dow ES&S in his/her absence, is responsible for determining when an evacuation is necessary.

In the event a facility evacuation is called for, the following actions will be taken:

- The signal for facility evacuation will be activated.
- The guards will immediately open the gates. No further entry of visitors, contractors, or vehicles will be permitted unless they are involved in emergency response.
- All non-essential personnel, visitors, and contractors will immediately leave through the nearest exit gate that is not downwind of a release.
- No persons shall remain at or re-enter the location unless serving as the emergency response team. This will normally include only Fire Department personnel, Dow ES&S, emergency teams, and the FEC.
- All persons will be accounted for by their facility supervisors. Supervisors pre-designate gates as the safest exits for employees and also alternate exits if the first choice is inaccessible.
- Any attempts to locate persons not accounted for could involve endangering lives of others by re-entry into emergency areas unless the hazards are known and proper protective equipment is worn. Therefore, re-entry will generally only be performed by trained Emergency Response personnel.
- Re-entry into the evacuated area will be made only after clearance is given by the FEC. At his/her direction, a signal or other notification (i.e., all clear) will be given for re-entry into the facility.

Drills are held to practice all of these procedures.

#### **B. Waste Storage Area I (1143 Building)**

Persons present in the storage unit have two-way radios that may be used to initiate an emergency response. Persons at the facility may use the nearby incinerator siren system that rises and falls in pitch continuously to initiate evacuation of all facility areas. In addition to the alarm, the internal telephone system is used to notify key plant personnel as to the nature of the emergency and recommended plan of action. Facility evacuations may be initiated by a FEC or Dow ES&S using Michigan Operations' alert system.

#### **C. 1163 Building and 33 Building**

These units employ a two-way radio system to initiate evacuation of the area. The radio may be used to notify key plant personnel as to the nature of the emergency and recommended plan of action. Facility evacuations may be initiated by a FEC or Dow ES&S using Michigan Operations' alert system.

**D. Tertiary Pond**

A two-way radio system is used to initiate evacuation of the area. The radio may be used to notify key plant personnel as to the nature of the emergency and recommended plan of action. Facility evacuations may be initiated by a FEC or Dow ES&S using Michigan Operations' alert system.

**E. 34 Building, 1078 Building and 1561 Trailer**

These buildings employ a siren system that rises and falls in pitch continuously to initiate evacuation of all areas. In addition to the alarm, the internal telephone system and two-way radio system is used to notify key personnel as to the nature of the emergency and recommended plan of action. Facility evacuations may be initiated by a FEC or Dow ES&S using Michigan Operations' alert system.

**F. Incineration Complex (including 830 Building Container Storage and Unloading Spots)**

The unit employs a siren system that rises and falls in pitch continuously to initiate evacuation of all plant areas. In addition to the alarm, the internal telephone system is used to notify key plant personnel as to the nature of the emergency and recommended plan of action. Facility evacuations may be initiated by a FEC or Dow ES&S using Michigan Operations' alert system.

**G. Closed Units, Waste Management Units and Staging Pile/CAMU (located on closed Diversion Basin)**

A two-way radio system is used to initiate evacuation of the area. The radio may be used to notify key plant personnel as to the nature of the emergency and recommended plan of action. Facility evacuations may be initiated by a FEC or Dow ES&S.

**H. Salzburg Landfill**

The unit employs a siren system that rises and falls in pitch continuously to initiate evacuation of all areas. In addition to the alarm, the internal telephone system and two-way radio system is used to notify key personnel as to the nature of the emergency and recommended plan of action. Facility evacuations may be initiated by a FEC or Dow ES&S using Michigan Operations' alert system.

**Evacuation Routes** (See Michigan Operations Map below)

**1. Waste Storage Area I**

<b>Evacuate</b>	<b>Assemble</b>
To 1078 Bldg. or 34 Bldg.	1078 or 34 Bldg. Control Room
Through 23 (Contractor) Gate <sup>1</sup> *	123 Bldg.**
Through Washington Street Gate or Buttles Street Gate *	Outside gate**
Through 53 Gate *	South side of T-Pond**
Through 20 Gate *	1108 Bldg. at south end of bridge**

2. 1163 Building and 33 Building

<b>Evacuate</b>	<b>Assemble</b>
To 1078 Bldg. or 34 Bldg.	1078 or 34 Bldg. Control Room
Through 23 (Contractor) Gate <sup>1</sup> *	123 Bldg**
Through Washington Street Gate or Buttles Street Gate *	Outside gate**
Through 53 Gate *	South side of T-Pond**
Through 20 Gate *	1108 Bldg at south end of bridge**

3. Tertiary Pond

<b>Evacuate</b>	<b>Assemble</b>
To 1108 Building	South Side of Bridge
To 1078 Bldg. or 34 Bldg.	1078 or 34 Bldg. Control Room
Through Washington Street Gate or Buttles Street Gate *	Outside the gate **
Through 53 Gate if appropriate *	Outside the gate **

4. Incineration Complex

<b>Evacuate</b>	<b>Assemble</b>
To 1078 Bldg. or 34 Bldg.	1078 or 34 Bldg. Control Room
Through 23 (Contractor) Gate <sup>1</sup> *	123 Bldg.
Through Washington Street Gate or Buttles Street Gate *	Outside gate**
Through 20 Gate *	1108 Bldg. at south end of bridge

5. 34, 1078 and 1561 Buildings

<b>Evacuate</b>	<b>Assemble</b>
Through 23 (Contractor) Gate <sup>1</sup>	123 Bldg.
Through Washington Street Gate or Buttles Street Gate	Outside gate**
Through 53 Gate	Outside gate**
Through 20 Gate	1108 Bldg. at south end of bridge**

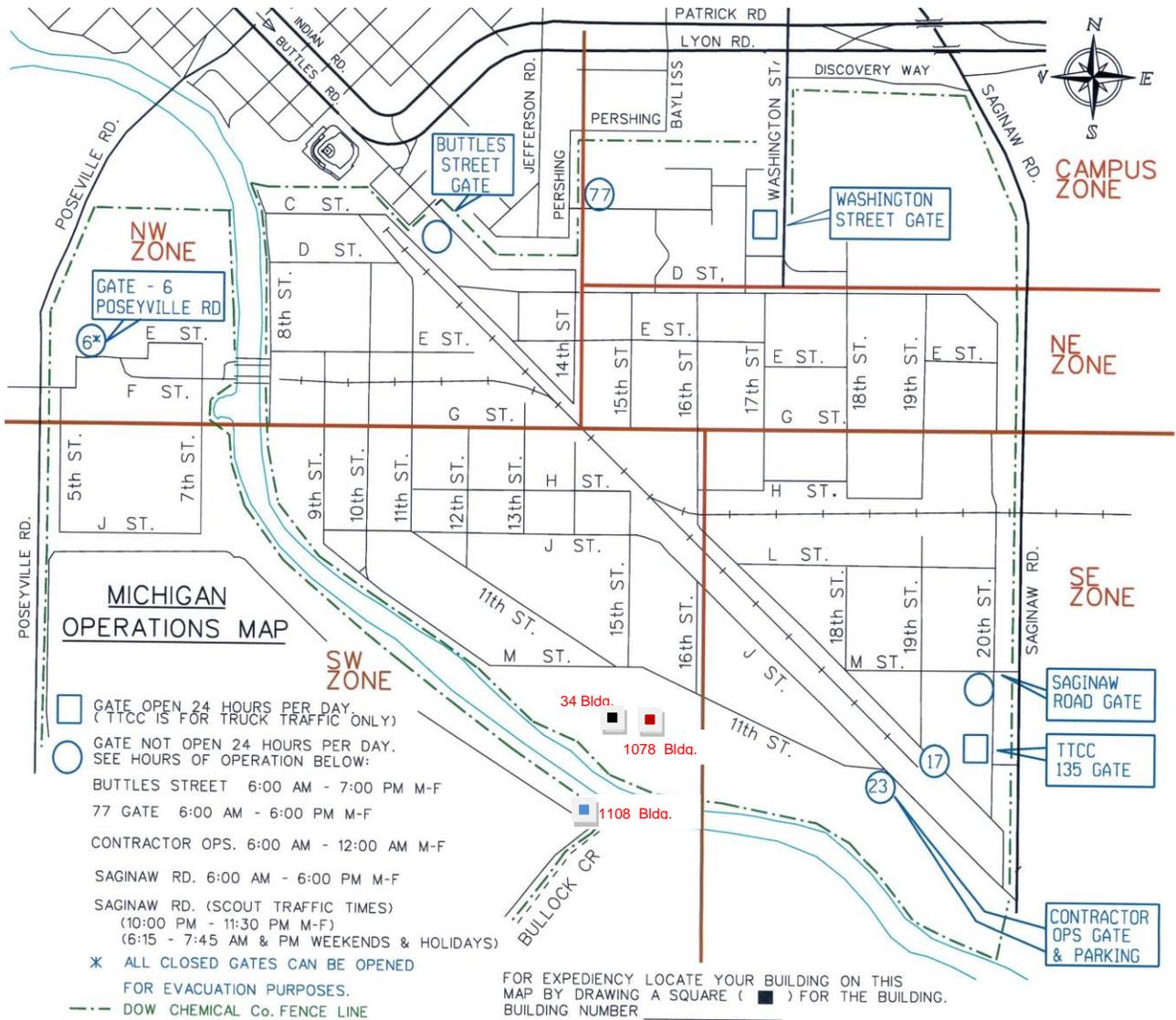
6. Closed Units, Waste Management Units and Staging Pile/CAMU

<b>Evacuate</b>	<b>Assemble</b>
To 1078 Bldg. or 34 Bldg.	1078 or 34 Bldg. Control Room
Through 23 (Contractor) Gate <sup>1</sup> *	123 Bldg**
Through Washington Street Gate or Buttles Street Gate *	Outside gate**
Through 53 Gate *	South side of T-Pond**
Through 20 Gate *	1108 Bldg at south end of bridge**

Dow Chemical Michigan Operations & Salzburg Landfill Operating License Reapplication

Revised ~~September 16~~ March 19, 2014 ~~2015~~

MID 000 724 724 & MID 980 617 435



7. Salzburg Landfill (See attached drawing B2-106-1374)

Evacuate	Assemble
<b>Through #90 Gate</b> 1. Main entrance to facility (Salzburg Rd North of 3600 bldg.)	Primary - Across Salzburg Rd, North of #90 Gate**  Alternate – Corner of Salzburg Rd & Waldo Ave.**
<b>Through #91 Gate</b> 2. East of #90 Gate on Salzburg Rd. (NNE of 3600 bldg.)	
<b>Through #92 Gate</b> 3. Corner of Salzburg Rd. & Waldo Ave. (ENE of 3600 bldg.)	
<b>Through #93 Gate</b> 4. On Waldo Ave, South of #92 Gate and West of #96 Gate (ESE of 3600 bldg.)	
<b>Through #96 Gate</b> 5. On Waldo Ave., South of #92 Gate and East of #93 Gate (ESE of 3600 bldg.)	
<b>Through #78 Gate</b> 6. On CSX railroad tracks West of #96 Gate (SE of 3600 bldg.)	
<b>Through #84 Gate</b> 7. On CSX railroad tracks Southwest of #90 Gate (SE of 3600 bldg.)	
<b>Bulldozer or other vehicle through the perimeter fence</b> 8. This is an alternate exit from the site	

\* If evacuation to 1078 or 34 Building is not possible

\*\* Contact supervision or Immediate Response Leader via radio for accountability.

<sup>1</sup> Gate can be remotely opened by contacting Security using two way radios or by phone (636-4400).

**Attachment A7.3:** Emergency Equipment Description

**Attachment A7.4: Facility Emergency Coordinator List**

The Facility Emergency Coordinator (FEC) role may often be filled by the facility Immediate Response Leader (IRL), Environmental Operations Supervisor On-call, EH&S On-call or other trained individuals at Dow and has the authority to commit all the resources required to implement the Contingency Plan.

This list gives all Environmental Operations Supervisor On-call persons qualified to act as the Facility Emergency Coordinator. The personnel on this list work on a rotation schedule that is subject to change. Please contact the facility Head Operator so the Environmental Operations Supervisor on-call person may be contacted.

<b>Facility Emergency Coordinator</b>	
<b>Name</b>	<b>Work Phone</b>
Head Operator (a.k.a. Immediate Response Leader)	989-638-1928

Note: The Environmental Operations Supervisor On-call list has been provided to the DEQ-OWMRP and is on file with the original Contingency Plan, but is Dow Confidential Information.

**Attachment A7.5:** Part 315 Dam Safety Emergency Action Plan