



The Dow Chemical Company  
Midland, Michigan 48667

Michigan Operations  
October 27, 2003

Cheryl Howe  
Waste and Hazardous Materials Division  
Michigan Department of Environmental Quality  
P.O. Box 30241  
Lansing, MI 48909-7741

RE: Interim Response Activities for Center Road Boat Launch

Dear Ms Howe:

Based upon the information provided in the Michigan Department of Environmental Quality, Final Report, Phase II Tittabawassee/Saginaw River, Dioxin Flood Plan Sampling Study, June 2003 and several discussions with Saginaw Township Park officials the attached Interim Response Activities were agreed to be implemented by park officials to reduce potential exposure of boat launch visitors.

Some of these interim activities are underway with plans to complete all of them before Memorial Day 2004.

Please contact Ben Baker at 989-636-0787 if you have questions regarding this submittal.

Sincerely,

A handwritten signature in black ink that reads "Susan Carrington". The signature is written in a cursive style and is positioned above the typed name.

Susan Carrington  
Vice President and Director  
Michigan Dioxin Initiative  
The Dow Chemical Company  
47 Building  
Midland, MI 48667

**WORK PLAN**

**INTERIM RESPONSE ACTIVITIES  
WORK PLAN**

**CENTER ROAD BOAT LAUNCH**

*The Dow Chemical Company—Midland  
Operations  
MIDLAND, MICHIGAN*

*For:*

**The Dow Chemical Company  
47 Building  
Midland, Michigan 48667**

October 24, 2003

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## 1.0 Introduction

On June 12, 2003, The Dow Chemical Company's Midland Plant (Dow) was issued a Resource Conservation and Recovery Act (RCRA) Operating License (the "License") by the Michigan Department of Environmental Quality (MDEQ). The License governs Dow's hazardous waste management activities at the Midland Plant, and also contains requirements for RCRA Corrective Action both onsite and offsite. The off-site provisions contained in Sections XI.B. and XI.G. of the License are the bases for this Work Plan.

This Work Plan describes the Interim Response Actions (IRAs) that will be implemented at the Center Road Boat Launch. The Center Road Boat Launch is located on the Tittabawassee River in Saginaw Township (Figure 1). This facility was not investigated as part of recent studies by MDEQ, *FINAL REPORT, Phase II Tittabawassee/Saginaw River, Dioxin Flood Plain Sampling Study, June 2003*, yet this Report did recommend elimination of potential exposures in public areas in the flood plain such as parks and boat launches. Dow decided to evaluate this public access area to see if any interim response actions would be necessary to adequately protect human health. Any interim response actions will be developed in consultation with township officials to address any unacceptable potential exposures of visitors to the boat launch.

## 2.0 Site Location and Description

The Center Road Boat Launch is located in Saginaw County on Center Road south of Michigan (Figure 1). Figure 2 is a recent aerial photo that shows site features such as parking lots, roads, boat launch areas, etc. This approximately five-acre property consists of a parking lot leading to the boat launch ramp in the river. There is also handicap access via a small wooden platform deck that overlooks the river edge, and no buildings. The information collection process is ongoing and includes a search for relevant maps, drawings, flood patterns and depositional areas, any flood mitigation activities implemented (i.e., levees, channelizing drainage, etc.), visitor frequency, seasonal variations, boat launching, dredging history, historic property use in general, any planned modifications or improvements, and any historical dredging and flood control records.

## 3.0 Description of Planned Interim Response Activities

Although it is not clear whether interim response actions are necessary to protect human health at Center Road Boat Launch, as a precautionary measure and to alleviate any concern that may exist with respect to environmental conditions at this location discussions were held with township officials that are responsible for this park. The following Interim Response Actions (IRAs) were identified for implementation, as precautionary measures.

- The area around the boat launch will be covered with an appropriate material such as crushed stone or riprap to limit potential exposures to soils and sediments.
- Bank erosion by handicap platform will be stabilized to prevent additional erosion by placement of fabric and large riprap.

- River access point at SW side of handicap platform will have stone placed to cover exposed soil.
- Fencing along SE side of the boat launch will be improved to minimize access to areas toward Center Road Bridge.
- Trees that are severely leaning toward the river will be trimmed or removed to prevent further erosion and bank damage.

Township park officials have agreed to have these items completed as soon as possible and before winter if possible. Dow will reimburse the township for the costs incurred as a result of these interim measures.

#### **4.0 Report and Schedule**

A brief report summarizing these IRAs will be submitted to MDEQ once they are completed. Implementation of these IRAs will commence in 2003 and be completed by spring of 2004 when launch use will increase for the summer season. The schedule is subject to change based on flooding or other conditions that may directly affect implementation of the planned IRAs.

#### **5.0 References**

Michigan Department of Environmental Quality. 2003. Phase II Tittabawassee/Saginaw River Dioxin Flood Plain Sampling Study, June 2003.

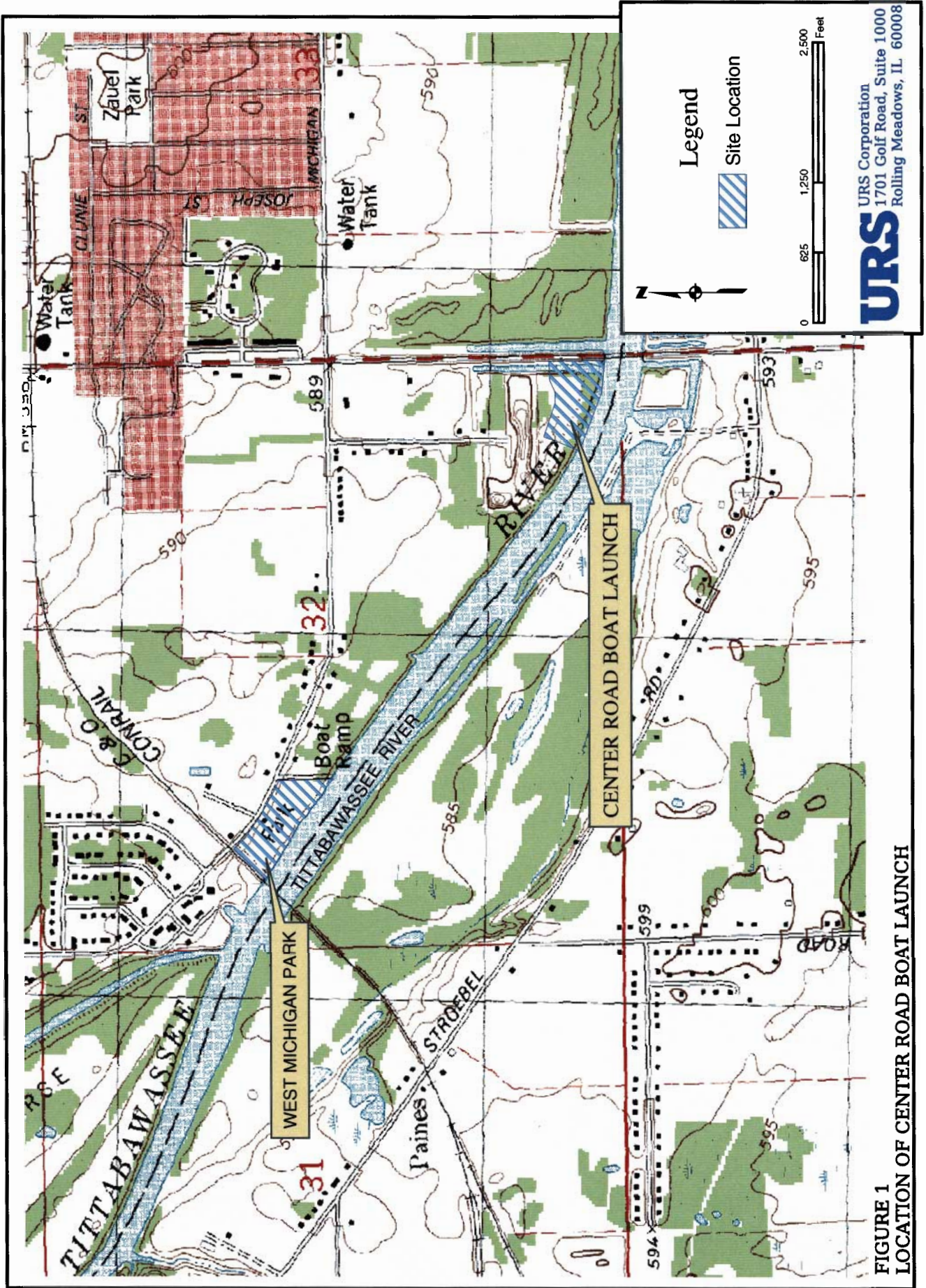
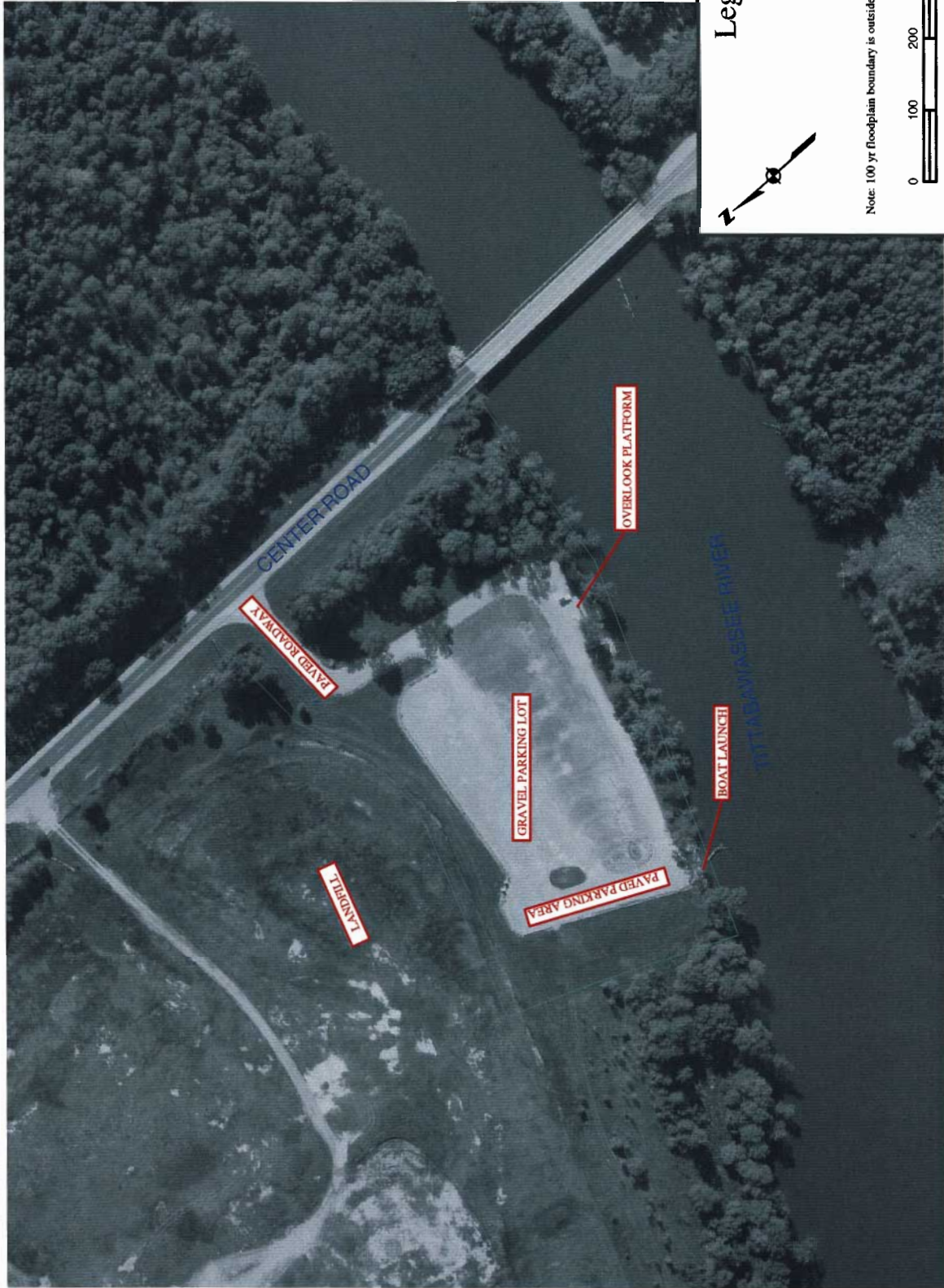
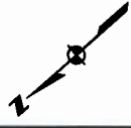


FIGURE 1  
LOCATION OF CENTER ROAD BOAT LAUNCH

**URS**  
URS Corporation  
1701 Golf Road, Suite 1000  
Rolling Meadows, IL 60008



**Legend**



Note: 100 yr floodplain boundary is outside of the view of this diagram.



**URS** URS Corporation  
 1701 Golf Road, Suite 1000  
 Rolling Meadows, IL 60008

**FIGURE 2**  
**FEATURES AT CENTER ROAD BOAT LAUNCH**