



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

April 8, 2019

CERTIFIED MAIL

Ms. Karen Mann  
EH&S Responsible Care Leader  
Environment, Health and Safety  
1790 Building, Washington Street  
Midland, Michigan 48674

Dear Ms. Mann:

**SUBJECT: CORRECTION: Hazardous Waste Facility Operating License  
Amendment 12; Corrective Action Required: New Area of Concern 54;  
The Dow Chemical Company, Michigan Operations, Midland Plant;  
MID 000 724 724**

This letter is to correct the numbering of the newly identified Mark Putnam area of concern (AOC) from AOC 61 to AOC 54; and add the license amendment number to the subject line. This correction is necessary due to additional information received from The Dow Chemical Company (Dow) on January 14, 2019, in Table 1-1, Update to Table B2-1, Summary of Potential or Actual Sources of Contamination, in the 2018 Corrective Action Implementation Summary Report and 2019 Work Plan for the Midland Plant; and information received on April 3, 2019, via email, which provides the rationale for maintaining Mark Putnam as AOC 54 because the headers on the table are used to categorize the AOCs. Mark Putnam was assigned as AOC 54 by Dow to fall under the heading "Other AOCs." AOC 61 aligns with the "River Corrective Action" header. The required follow up notification to the facility mailing list is now required within 90 days after the date of this correction. For your convenience, the corrected language for the Michigan Department of Environmental Quality (MDEQ) letter dated January 10, 2019, is produced below:

The Michigan Department of Environmental Quality (MDEQ), Waste Management and Radiological Protection Division (WMRPD), has reviewed the November 16, 2018, *Notification of New Area of Concern* (Notification) from The Dow Chemical Company (Dow) for its Michigan Operations, Midland Plant facility located at 1790 Building, Washington Street, in Midland, Michigan (Facility). The Notification was reviewed for compliance with Condition XI.F of the Facility's hazardous waste management facility operating license, reissued September 25, 2015 (License), pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Based on this review, corrective action is required for the newly identified area of concern (AOC), pursuant to Condition XI.F.2 of the License, in order to characterize the nature and extent of contamination and implement appropriate corrective measures.

The newly identified AOC shall be known as AOC 54. Below is a summary of the information on the AOC based on the WMRPD's review of the Notification.

<b>Summary of Newly Identified Unit AOC 54</b>	
<b>Number</b>	54
<b>Unit</b>	Area of soil south of Mark Putnam Road and east of South Saginaw Road, extending to the south and east an undetermined distance.
<b>WMU or AOC</b>	AOC
<b>Unit Characteristics</b> (What unit is like today)	Impacted soil encountered during construction activities. A review of aerial photographs suggests that some type of industrial activity took place in the area of the new AOC at some point after 1952 and before 1983. No information is currently available on the specific industrial activity that took place in this area.
<b>History of Release</b> (includes brief site history & release/source description)	The nature and extent of the contamination identified has not been fully characterized. Analytical data from a single soil sample showed detections of the following compounds: arsenic, barium, total chromium, lead, 1,2,4-trichlorobenzene, 1,2-dichlorobenzene, 1,3-dichlorobenzene, 1,4-dichlorobenzene, benzene, cis-1,2-dichloroethylene, ethylbenzene, tetrachloroethylene, total xylenes, 1,2,3,4-tetrachlorobenzene, 1,2,4,5-tetrachlorobenzene, biphenyl (diphenyl), hexachlorobenzene, and naphthalene.
<b>Interim Measures</b>	Not currently requested.
<b>Status</b>	Identified October 25, 2018. A corrective action investigation is required for the newly identified AOC to characterize the nature and extent of contamination. Additional corrective action requirements will be determined based on the results of the investigation. Update the 2019 annual Corrective Action Implementation Plan (CAIP) to address the unit.
<b>Summary of Potential or Actual Sources of Contamination</b>	Unknown. The new AOC is not a release from any known waste management unit.

### Required Follow Up

Pursuant to Rule (R) 299.9519(9), AOC 54 is incorporated into Table B2-1, of Attachment 19 to the License, as a minor modification. Please include information and corrective action proposals for the newly identified AOC in the annual CAIP Report.

In accordance with R 299.9519(6)(b) of the Part 111 administrative rules, Dow is required to send notice of minor modifications 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 is enclosed. Please notify the WMRPD 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.

If you have any questions, please contact Mr. Dan Dailey, Environmental Engineer Specialist, Permit and Corrective Action Unit, Hazardous Waste Section, WMRPD, at 517-242-7261; daileyd@michigan.gov; or MDEQ, WMRPD, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,

A handwritten signature in cursive script, appearing to read "Virginia Himich".

Virginia Himich, Supervisor  
Permit and Corrective Action Unit  
Hazardous Waste Section  
Waste Management and Radiological  
Protection Division  
517-284-6560

Enclosure

cc: Mr. Al Taylor, MDEQ  
Ms. Trisha Confer, MDEQ  
Mr. Dan Dailey, MDEQ  
Mr. Art Ostaszewski, MDEQ  
Mr. Joe Victory, MDEQ  
cc/enc: Corrective Action File – On-Site