

MODULE A9

LOCATION INFORMATION

**Rule R299.9504(c)
40 CFR 270.14(b)(11)**

A9.A LOCATION INFORMATION

Dow Silicones Corporation (Dow Silicones) is a wholly owned subsidiary of The Dow Chemical Company and has its world headquarters in Midland, Michigan. The site address is: 3901 South Saginaw Road, Midland, Michigan 48640 and is owned by Dow Silicones Corporation. Figures showing facility location are as follows: Figure A1-1 is a location map; Figure A1-2 is a regional topographic map; and Figure A1-3 is a local topographic map. Appendix A1-1 is a site plan showing permitted facility boundaries, major buildings, and hazardous waste storage areas. Process and design information for the storage units is provided in Modules C1 and C2. The Dow Silicones facility occupies approximately 350 acres of land in the southern portion of the City of Midland in Section 26 of Midland Township: Township 14N, Range 2E. Only 0.75 acre of the Dow Silicones facility is regulated under RCRA or Part 111 of Act 451.

A9.A(1) Floodplain Standard

The Dow Silicones facility is not located within the boundary of a 100-year floodplain. This determination is made after review of the Flood Insurance Rate Map prepared under the National Flood Insurance Program for this area. Figure A13-2 (Flood Plain Map) highlights the panel in which the Dow Silicones facility is located, Zone C, which represents an area of minimum flooding (Zone A is within the 100-year floodplain and Zone B is between the 100-year and 500-year floodplain). The National Flood Insurance Program did not develop Zone C area panels due to minimal flooding within these areas.

A9.A(2) Seismic Standard

The State of Michigan is classified under low seismic hazard in the 2008 United States Geological Survey (http://pubs.usgs.gov/of/2008/1128/pdf/OF08-1128_v1.1.pdf). Mineral extraction, sand or gravel mining, or hydrocarbon extraction has not occurred near the Dow Silicones site to any significant degree.

A9.A(3) Isolation Distances

The container and tank storage areas and the landfill are located greater than 1,000 feet from the nearest property line, thereby exceeding the minimum requirement of 150 meters (about 400 feet) of isolation distance for the landfill and 60 meters (about 200 feet) for the storage areas. As shown in Figure A13-2, the facility is not located within a 100-year floodplain.

A9.A(4) Permeability

Complete information on the underlying site geology, including soil layers and permeability data, are presented in Module B3, Hydrogeologic Report.

A9.A(5) Other Location Standards

Dow Silicones Midland Plant Site licensed hazardous waste facility is an existing facility and no alterations to the facility are requested in this application. To the best of Dow Corning's knowledge and information, this facility is not located in any of the following areas:

- Within 61 meters of a fault which had its displacement in Holocene time;
- In a floodway designated by the DNRE under Part 31 of the Act;
- In a coastal high risk area designated under Part 323 of the Act;
- Over a sole-source aquifer;
- Within the isolation distance from public water supplies specified by Act 399;
or
- In a wetland.

A9.A(5) Compliance with Other Federal Laws

The Wild and Scenic Rivers Act

The prohibitions contained in the Wild and Scenic Rivers Act, 16 U.S.C. 1273 *et seq.*, are not applicable to this facility as there are no federally designated wild and scenic rivers near the facility which could be affected by facility operations.

The National Historic Preservation Act of 1966

The requirements of the National Historic Preservation Act of 1966, 16 U.S.C 470 *et seq.*, are not applicable to this facility as there are no structures or properties on or near the hazardous waste facility which are listed or eligible for listing in the National Register of Historic Places.

The Endangered Species Act

To the best of the knowledge of Dow Silicones Corporation there are no endangered or threatened species within or in the vicinity of this facility which are protected under the Endangered Species Act, 19 U.S.C. 1531 *et seq.*, whose continued existence may be jeopardized or whose habitat may be adversely affected by the presence and operation of this facility.

The Coastal Zone Management Act

Dow Corning is not located within a coastal zone and is therefore not subject to the State Coastal Zone Management program, according to the Coastal Zone Management Act, 16 U.S.C. 1451 *et seq.*