

ATTACHMENT 4
CONTINGENCY PLAN

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

This document is an attachment to the Department of Natural Resources and Environment's *Instructions for Completing Form EQP 5111, Hazardous Waste Treatment, Storage, and Disposal Facilities Construction Permit and Operating License Application Form*. See Form EQP 5111 for details on how to use this attachment.

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 299.9607 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 module addresses requirements for a contingency plan at the hazardous waste management facility at Dow Corning Corporation in Midland, Michigan.

(Check as appropriate)

- Operating License Applicant
 Construction Permit Applicant

This module is organized as follows:

INTRODUCTION

A7.A BACKGROUND INFORMATION

- A7.A.1 Purpose of the Contingency Plan
- A7.A.2 Description of Facility Operations
- A7.A.3 Identification of Potential Situations

A7.B EMERGENCY COORDINATORS

- A7.B.1 Identification of Primary and Alternate Emergency Coordinators
- A7.B.2 Qualifications of the Emergency Coordinators
- A7.B.3 Authority to Commit Resources

A7.C IMPLEMENTATION OF THE CONTINGENCY PLAN

A7.D EMERGENCY PROCEDURES

- A7.D.1 Immediate Notification Procedures for Facility Personnel and State and Local Agencies with Designated Response Roles
- A7.D.2 Procedures to Be Used for Identification of Releases
- A7.D.3 Procedures to Be Used to Assess Potential Hazards to Human Health and the Environment
- A7.D.4 Procedures to Determine if Evacuation is Necessary and Immediate Notification of Michigan Pollution Emergency Alerting System and National Response Center
- A7.D.5 Procedures to Be Used to Ensure That Fires, Explosions, and Releases Do Not Occur, Reoccur, or Spread During the Emergency
- A7.D.6 Procedures to Be Used to Monitor Equipment Should Facility Operations Cease

- A7.D.7 Procedures to Provide Proper Treatment, Storage, and Disposal for Any Released Materials
- A7.D.8 Procedures for Cleanup and Decontamination
- A7.E NOTIFICATION AND RECORD KEEPING REQUIREMENTS
 - A7.E.1 Procedures to Be Used to Notify State and Federal Officials Prior to Commencement of Operations
 - A7.E.2 Record Keeping Requirements
 - A7.E.2(a) Operating Record
 - A7.E.2(b) Written Incident Report
- A7.F PROCEDURES FOR REVIEWING AND AMENDING THE CONTINGENCY PLAN

List of Tables

- Table A7-1 Information Provided to Local Authorities
- Table A7-2 Identification of Primary & Alternate Emergency Coordinators
- Table A7-3 Federal, State, and Local Response Contacts

List of Appendices

- Appendix A7-1: Documentation of Arrangements with Local Authorities
- Appendix A7-2: Dow Corning's Incident Classifications
- Appendix A7-3: Spill Prevention Control and Countermeasures Plan
- Appendix A7-4: Evacuation Plan and Routes
- Appendix A7-5: Emergency Equipment Description
- Appendix A7-6: Location of 800 Block Emergency Equipment
- Appendix A7-7: Checklist - Tracking Facility Response Actions during and after a Fire/Explosion Incident

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 establishes the procedures to be followed in the event of an emergency situation at the Dow Corning Corporation (Dow Corning) facility in Midland, Michigan. An emergency may involve a fire, explosion, or any unplanned sudden or non sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water.

The provisions of this plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

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 material handled, locations of the working areas, access routes into and within the facility, possible evacuation routes from the facility, and types of injuries or illness that could result from releases of materials at the facility. This information has been submitted to the local authorities as identified in Table A7-1. Whenever the contingency plan is modified, the facility will provide the agencies with a copy of the modified plan.

Appendix A7-1 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.

This Contingency Plan has been prepared in accordance with the requirements of 40 CFR, Part 264, Subpart D, and Michigan Administrative Code (MAC) R 299.9607.

A7.A.2 Description of Facility Operations

The Dow Corning facility is located at 3901 South Saginaw Road in Midland, Michigan. At the Midland site, Dow Corning manufactures a variety of silicon-based intermediates for use in industrial processes by other Dow Corning locations and by industrial customers, as well as finished products for end markets. Hazardous wastes are generated from the manufacturing processes, off-spec products, pollution control devices, cleaning of process equipment, and from pilot plant and laboratory operations. The facility also accepts returned products from its customers, as well as spill cleanup materials from those products so long as they have not been compounded with other materials or mixed with other wastes. These materials may be received at the licensed facility prior to transfer offsite for proper disposal or recycling.

Refer to Module A1 for more detailed site description. Waste Codes are provided in Table A2-1 in Module A2.

A7.A.3 Identification of Potential Situations

Situations that could result in an emergency include, but are not limited to:

- Fire or Explosion
- Releases from containers
- Releases from tanks
- Vapor releases

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 facility, with the responsibility for coordinating all emergency response measures. Table A7-2 lists employees designated as Emergency Coordinators.

A7.B.2 Qualifications of the Emergency Coordinators

[R 299.9607 and 40 CFR §264.55]

All Emergency Coordinators are fully qualified to serve as Emergency Coordinators. All Emergency Coordinators at the Dow Corning facility are OSHA HAZWOPER trained and the certificates are available on-site. They are knowledgeable of the facility's operations and activities, and how these operations and activities are impacted by RCRA obligations. The Emergency Coordinators are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities of the facility, the location of all records within the facility, and the facility layout.

A7.B.3 Authority to Commit Resources

[R 299.9607 and 40 CFR §264.55]

The Emergency Coordinators have complete authority to commit resources of the company that may be needed to carry out the Contingency Plan. The Emergency Coordinator's responsibilities are specified under the emergency response procedures contained in this plan.

In the event of an emergency situation requiring activation of this Contingency Plan, the Emergency Coordinator will work in cooperation with the Loss Prevention Incident Commander and the Production Incident Commander to coordinate effective emergency response, within Dow Corning's incident command structure.

A7.C IMPLEMENTATION OF THE CONTINGENCY PLAN

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

A7.C.1 Methods Used to Notify Emergency Coordinator

Activation of Internal Facility Alarms or Communications Systems [40 CFR 270.14(b)(7), 264.56(a)(1), 265.56(a)(1), MAC R 299.9607(1)]

All Dow Corning Midland plant personnel are trained to report any emergency situations in the plant or licensed facility to the Safety and Loss Prevention Department dispatcher at the Main Clock Room on the emergency telephone number 989-496-4396, or extension 4300 from telephones within the site. A Loss Prevention Officer is on duty at this number at all times. When an emergency is reported, the Loss Prevention Dispatcher dispatches appropriate response resources and contacts the designated on-call representative from the Midland plant Environmental Services Department and the Production Incident Commander for the area.

The Loss Prevention Dispatcher on duty at the Main Clock Room may become aware of an emergency by means of any of several communication and alarm systems in use within the Midland site, including the licensed facility and all 90-day generator hazardous waste areas:

1. Telephone: All Dow Corning Midland plant personnel are trained to report any emergency situations in the plant or licensed facility to the Safety and Loss Prevention Department dispatcher at the Main Clock Room on the emergency telephone number 989-496-4396, or extension 4300 from telephones within the site.
2. Radio: Many plant and licensed facility personnel also carry portable two-way radios and the Main Clock Room dispatcher monitors this radio traffic within the site.
3. Emergency shower/eyewash alarm: Activation of any of the emergency shower/eyewashes located at various buildings and tank farms around the site causes an alarm indication at the Main Clock Room. Emergency shower/eyewash combinations in the licensed facility are located in the 805, 807 (next to the 806 tank farm) and 811 Buildings. Upon receipt of the alarm, the Loss Prevention Dispatcher sends an emergency response team consisting of at least one fire engine and the emergency medical unit to the source of the alarm.
4. Fire sprinkler alarm: Plant production, laboratory, and warehouse buildings, as well as the 809 Building at the licensed facility, are equipped with automatically activated fire sprinkler systems. When any fire sprinkler system in the Midland site is activated, a sprinkler water flow sensor sends an alarm indication to the Main Clock Room. Upon receipt of the alarm, the Loss Prevention Dispatcher sends an emergency response team consisting of at least one fire engine and the emergency medical unit to the source of the alarm.

In the event of an emergency situation the Loss Prevention Dispatcher on duty will contact the Loss Prevention Incident Commander and the Production Incident Commander by telephone, radio, or pager. The Loss Prevention Dispatcher will notify the Emergency Coordinator, also by telephone, radio, or pager. Internal facility alarms or communication systems will be activated when the Loss Prevention Dispatcher or the Loss Prevention Incident Commander determines it to be advisable to ensure the safety of site personnel.

The Emergency Coordinator 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 Emergency Coordinator must implement this plan whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

A7.C.2 Implementation of Contingency Plan

Section A7.A.3 identifies general conditions or circumstances that may require implementation of this contingency plan. The decision to implement the Contingency Plan depends upon whether or not an imminent or actual incident involving hazardous wastes could threaten human health or the environment. The purpose of this section is to provide the guidelines to the Loss Prevention Incident Commander and the Emergency Coordinator for making this decision. Appendix A7-7 is a Facility Response Actions Tracking checklist providing information regarding response actions during and after a fire/explosion incident.

The Contingency Plan will be implemented in the following situations:

Fire and/or Explosion

- a. A fire causes the release of the toxic hazardous waste to the air in such quantities that it could cause imminent threat to human health or the environment.
- b. The fire spreads and could possibly ignite materials at other locations on-site or could cause heat-induced explosions.
- c. The fire could possibly spread to off-site areas.
- d. Use of water or water/chemical fire suppressant results in un-permitted discharges to surface waters.
- e. An imminent danger exists that an explosion could occur, causing a safety hazard off-site because of flying fragments or shock waves.
- f. An imminent danger exists that an explosion could ignite other hazardous waste at the facility.
- g. An imminent danger exists that an explosion could or did result in release of toxic material in such quantity that could cause an imminent threat to human health or the environment.

Spills or Material Release

- a. The spill of hazardous waste could result in a fire or gas explosion hazard which would create an imminent hazard to human health and the environment off-site.
- b. The spill could cause the release of toxic liquids or fumes which would create an imminent hazard to human health, including plant and facility personnel and other Dow Corning employees, and the environment. Spills of small quantities which do not create unusual hazards significantly greater than those encountered by plant or facility personnel during normal operations will not

require activation of the Contingency Plan.

- c. The spill can be contained on site, but the spill would cause groundwater contamination which would create a hazard to human health or the environment.
- d. The spill cannot be contained on-site, resulting in off-site soil contamination and/or ground or surface water pollution.

Dow Corning's four incident classifications are:

1. Minor Incidents (an event which involves a very small amount of a hazardous substance with emergency actions confined to the area immediately surrounding the source of the event);
2. Informational Calls (an event which is best described as a detectable cloud, unusual odor or detectable change from normal, as noticed at the Site fence line);
3. Site Emergency (when more than neighboring buildings on Site are affected by the emergency event and the community is not exposed to chemical concentrations or other risks that would cause adverse health effects due to control measures being employed); and
4. Community Emergency (when the released material will or has entered the community at a level greater than the threshold limit value (TLV) or the emergency poses physical harm to the community beyond the fence line such as in extensive fire or explosion incidents).

Any spill, release, fire or explosion involving hazardous wastes and which is classified under Dow Corning's site emergency plan as a "site emergency" or as a "community emergency" will automatically require activation of this Contingency Plan. Incidents classified by Dow Corning's Safety & Loss Prevention Department as "minor incidents" or "informational calls" will be evaluated on a case by case basis by the Emergency Coordinator or Alternate, using the criteria listed above, to determine whether activation of the Contingency Plan is required. See Appendix A7-2, "Dow Corning Incident Classifications", for more information on the four incident classification categories.

A7.D EMERGENCY PROCEDURES

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

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

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]

A7.D.1(a) Notification of Facility Personnel

The Emergency Coordinator will notify facility personnel of an imminent or actual emergency situation using one or more of the procedures described below. Internal alarm systems for notification of site personnel of the existence of an emergency situation are:

1. Telephone alarm system: The Loss Prevention Dispatcher can send alarm messages to designated telephones throughout the Midland site, including the licensed facility. The arrival of an alarm message is signaled by a distinctive ring.
2. Loudspeaker and alert strobe: A system of loudspeakers is installed at various locations throughout the Midland site, including at the licensed facility. The Loss Prevention Dispatcher can broadcast emergency messages over the loudspeakers from the Main Clock Room to alert site personnel. This same system includes bright flashing strobe lights on the loudspeaker boxes to further alert personnel.
3. Emergency siren: Emergency sirens are installed throughout the Midland site, including at the licensed facility. Two audible signals are used to designate the existence of an emergency:
 - Alternating high and low frequency tones indicate a site alert. This signal is accompanied by a voice message over the loudspeaker system.
 - A slowly rising "WHOOOP" signal indicates a site evacuation, and is also accompanied by a voice message over the loudspeaker system.
4. Local building alarm air horns are sounded when a building evacuation is necessary or when a safety shower/eyewash is activated.

To Report An Emergency:

- (1) Dial: 496-4396 or 4300 within plant (Loss Prevention Dispatcher will answer)
- (2) Report type of emergency, location, materials involved, any injuries

Midland Plant Standard Emergency Signals	
Tornado/Weather Warning	Alternating high/low tones and voice message
Plant Alert	Alternating high/low tones and voice message
Plant Evacuation	Slow "whoop" audible signal and voice message
Midland Plant Standard Emergency Signals	
Shower/ Eye Wash Local Alarm	Steady blast on building air horn
Building Evacuation	Repeating blasts on building air horn

Telephone Alert Signal	
Alert	Quick short rings on designated telephones throughout location (tested weekly)
All Clear	Verbal

A7.D.1(b) Notification of State and local agencies with designated emergency response roles

External emergency communications are conducted by telephone. Community emergency response agencies can be accessed by dialing 9-911 from any telephone within the Midland site. In addition, the Loss Control Dispatcher on duty in the Main Clock Room has a direct telephone line to the community 911 Central Dispatch Office and the Safety and Loss Prevention Department has direct radio communications capabilities with Midland City Fire Department both from the Main Clock Room and from the plant emergency vehicles.

The list of emergency contacts in Table A7-3 identifies local emergency response agencies, and state and federal authorities that must be notified in the event of an imminent or actual emergency situation requiring response.

The Emergency Coordinator will be responsible for ensuring that all appropriate authorities are notified as necessary. Whenever there is a fire or explosion involving hazardous wastes, or an imminent or actual release of hazardous wastes or hazardous waste constituents, which could threaten human health or the environment off-site, the Emergency Coordinator or designee will perform the following notifications:

1. Notify appropriate state or local agencies with designated response roles if their help is needed;
2. Notify appropriate local authorities if the Emergency Coordinator or Loss Prevention Incident Commander determines that an evacuation of local areas off-site may be advisable, and remain available to advise local officials on evacuation requirements.
3. Notification to Michigan's Pollution Emergency Alerting System (PEAS)

If there is a fire, explosion, or other release of hazardous waste or hazardous waste constituents that could threaten human health or the environment, or if the Emergency Coordinator has knowledge that a spill has reached surface water or groundwater, then the Emergency Coordinator will immediately notify Michigan's Pollution Emergency Alerting System (PEAS) (800-292-4706). The notification (required by R299.9607) will include:

- a. name and telephone number of the person who is reporting the incident
- b. name, address, telephone number and site identification number of the facility
- c. name, address and telephone number of the owner or operator
- d. date, time and type of incident
- e. name and quantity of the material or materials involved and released
- f. extent of injuries, if any

- g. estimated quantity and disposition of recovered material that resulted from the incident, if any
- h. assessment of actual or potential hazards to human health or the environment
- i. immediate response actions taken.

This notification may be made to DNRE district staff at the district office. Voice mail and electronic notification does not constitute proper notification. ("Immediately" means as soon as practicable after the occurrence giving rise to the notification requirement considering the need to initiate any emergency response actions necessary to mitigate imminent threats to human health or to the environment.).

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 Emergency Coordinator, or Alternate, and Production Incident Commander will immediately identify the character, exact source, amount and extent of the release. The initial identification method will be to use visual assessment of the material, based on the location of the release, container markings or tank logs, as appropriate, and other information in the facility operating records and available in the company material documentation database, which can be accessed from any computer terminal in the site.

The Emergency Coordinator and Alternates are familiar with the plant operations and licensed facility, and the types of wastes handled, which are described in Table A2-1 provided in Module A2. If for some reason the released material cannot be identified, samples will be taken for chemical analysis. Dow Corning maintains well-equipped chemical analysis laboratories capable of identifying materials which might be spilled or released from the plant or licensed facility. See Appendix A7-3 for a copy of the facility's Spill Prevention Control and Countermeasures (SPCC) Plan.

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 the release, fire, or explosion. 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.

The Loss Prevention Incident Commander and the Emergency Coordinator will assess possible hazards, both direct and indirect, to employee safety and to human health or the environment off-site, based on the type of material released, the size of the release, the location, and environmental factors such as wind velocity, precipitation and temperature. Dow Corning has available environmental monitoring equipment, including air sampling apparatus and instrumentation, to aid in this assessment if the Loss Prevention Incident Commander and/or Emergency Coordinator determine that it is appropriate.

Dow Corning maintains hazard information on all hazardous materials and wastes used, stored

or handled at the Midland plant and licensed facility. In the event of an emergency, the Loss Prevention Incident Commander and Emergency Coordinator have access to this information through the computerized material documentation database and the Material Safety Data Sheet database. These databases run on servers located off-site and may be accessed from any computer terminal in the Midland site, at Dow Corning corporate offices nearby in Auburn or remotely by dial-up access.

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 Emergency Coordinator's assessment indicates that evacuation of facility areas may be advisable, he will implement the evacuation plan (Appendix A7-4) for the facility areas. This would be limited to specific buildings and would be defined using wind direction and size of the release. It would be communicated to these buildings through contact with the Main Clock Room. This decision is made with input from the Site Safety management team.

If the Emergency Coordinator's assessment indicates that evacuation of the surrounding local areas is also advisable, the appropriate local authorities will be immediately notified (see Table A7-3). This assessment would be done based on interaction with the Site Emergency management team. This group is made up of key Site staff including the Plant Manager, Safety Manager and Environmental Manager; and would be called in to the site for a large site emergency. They, together with the Emergency Coordinator and the local Fire Chief would decide when an evacuation is warranted and communicate it to the appropriate City and County personnel. The National Response Center will also be notified (see Table A7-3), and the following information will be provided:

1. Name and telephone number of the reporting individual;
2. Name and address of the facility;
3. Time and type of incident;
4. Type and quantity of materials involved;
5. Possible hazards to human health or the environment; and
6. Extent of injuries, if applicable.

The facility's evacuation plan is included in this Contingency Plan as Appendix A7-4.

Michigan's PEAS line will also be notified (see Section A7.D.1).

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]

Module A6 (Preparedness and Prevention) presents procedures used to ensure that fires, explosions and releases do not occur.

During an emergency, the Emergency Coordinator 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 include:

Fire or Explosion

The possibility of fire or explosion is minimized by safe handling practices which include bonding and grounding equipment during transfer and storage of flammable liquids, purging and blanketing containers and tanks of flammables with inert gas, and not mixing incompatible materials.

Should a fire or explosion occur, response efforts will be directed to preventing the fire from spreading to other areas. The firefighting effort will be carried out by the Midland Site Loss Prevention Department and other trained responders.

The following actions will be taken in the areas affected by the fire or explosion:

- a. Work in all affected areas will be shut down immediately.
- b. All feed lines and additional equipment will be shut down as necessary and practical.
- c. Adjacent structures will be cooled, if necessary, using fire hose lines and/or monitor nozzles to prevent overheating.
- d. The area will be cleared of all personnel not actively involved in fighting the fire.
- e. All injured persons will be removed, and medical treatment will be administered by qualified personnel.

Releases

The initial response to any spill or release of hazardous wastes or waste constituents will be to first identify the material, then to prevent further release and limit the spread of the released material, then to recover as much material as possible and perform necessary cleanup operations in order to minimize the effects of the spill or release on human health and the environment.

Any release of hazardous waste or waste constituents at any of the plant satellite accumulation or 90-day generator storage areas, or at the licensed facility, as well as any other chemical spill or release within the site, is reported immediately to the Loss Prevention Dispatcher on duty in the Main Clock Room. In the event of a spill or release of hazardous waste or hazardous waste constituents with potential for significant impact to human health or the environment, the Loss Prevention Dispatcher will contact the Loss Prevention Incident Commander, the designated Production Incident Commander and the on-call Emergency Coordinator. The Production Incident Commander will obtain the following information:

1. The material spilled or released.
2. Location of the release or spillage of material.
3. An estimate of quantity released and the rate at which it is being released.
4. The direction in which the spill, vapor, or smoke is heading.
5. Any injuries involved.

6. Potential for fire and/or explosion.
7. The presence of any incompatible materials in the area of the spill or release.

Using this information, the Emergency Coordinator will assess the magnitude of the spill or release and its potential impact on human health and the environment. If the incident is determined to lie within the emergency response capabilities of the site, the Loss Prevention Incident Commander will contact and deploy the necessary in-plant personnel. If the incident is beyond plant capabilities, the Loss Prevention Incident Commander will contact the appropriate outside resources listed in Table A7-3.

a. General Spill Response Guidelines

The following general guidelines will be used in case of a spill or release of hazardous waste or waste constituents, although specific circumstances may dictate some alterations to these procedures.

- (1) Upon notification of the spill or release, the Loss Prevention Dispatcher on duty at the Main Clock Room will initiate emergency response and obtain the following information:
 - (a) Number and nature of injuries, if any.
 - (b) Location and source of the spill or leak.
 - (c) Type of material involved.
 - (d) Amount spilled, estimated discharge rate, direction of movement.
 - (e) Whether or not a fire is involved.
- (2) Upon arrival at the scene of the spill or release, the Loss Prevention Incident Commander will:
 - (a) Initiate evacuation of the hazard area. For small spills or leaks, isolate the immediate area. For large spills, initially isolate the immediate area and all downwind areas of exposure and keep all persons up-wind of the spill.
 - (b) Obtain medical attention for any injured persons.
 - (c) Eliminate sources of ignition in the area of a spill of ignitable waste by shutting down all production and maintenance operations that could generate heat or sparks and by restricting vehicular traffic from the area.
 - (d) Initiate application of firefighting foam to large spills of ignitable wastes, if the Loss Prevention Incident Commander determines this is appropriate.
 - (e) Call for additional Loss Prevention Department emergency response personnel or off-site emergency response services, as needed.
 - (f) Contact local authorities if there may be any effects to human health beyond the site boundaries, so that persons downwind of the vapor release can be notified and, if necessary, evacuated.
- (3) As directed by the Loss Prevention Incident Commander and the Emergency Coordinator, cleanup personnel will:

- (a) Put on protective clothing and equipment, as required.
 - (b) Make sure all unnecessary persons are removed from the area.
 - (c) If a flammable waste is involved, remove all ignition sources, and use spark and explosion proof equipment and clothing in containment and cleanup.
 - (d) If possible try to stop the leak. Specialized patching and repair materials are kept on hand for temporary repairs.
 - (e) Remove all surrounding materials that may react with spilled materials.
 - (f) Use absorbent pads, booms, earth, sandbags, sand, and other inert materials to contain, divert and clean up a spill if it has not been contained by secondary containment.
 - (g) Whenever possible, recover spilled liquids by pumping into tanks or containers.
 - (h) Properly package and label cleanup materials, absorbents, contaminated debris and discarded personal protective equipment for disposal at an off-site licensed hazardous waste facility.
- (4) Before transferring spilled hazardous waste into a tank or container, cleanup personnel will ensure that:
- (a) Materials to be transferred are compatible with the material of construction of the tank or container and the tank or container is free from leaks or other defects which could prevent it from adequately containing the material to be transferred.
 - (b) No incompatible materials are present in the tank or container(s) which could cause a reaction, fire, explosion.
 - (c) If the spilled material is to be transferred to a tank, the tank has sufficient capacity to contain the volume of material to be recovered.

Appendix A7-5 and Appendix A7-6 gives a detailed description of the type, amount, and location of all emergency equipment at the Dow Corning facility.

b. Releases from Containers

The contents of a leaking container will either be transferred to a container that is in good condition and properly labeled, or the leaking container will be over packed in another container and the outer container properly labeled. Any hazardous waste that is spilled will be collected and packaged for proper disposal, along with any contaminated absorbent used in the cleanup. Large spills may be removed using a vacuum truck or by pumping the spilled liquid to tanks or containers.

c. Releases from Tanks

In the event of a leak or spill from a hazardous waste storage tank or ancillary equipment, all feed lines to the storage tank will be closed. The source of the leak will be determined and necessary measures taken to stop the flow, including, as necessary,

shutting down all waste transfer operations not directly related to recovery of spilled materials, applying temporary patching materials to piping and/or tanks, or transferring materials from a leaking tank to another tank that is in good condition or to containers or to a tank truck. Before such a transfer is made, the Production Incident Commander and the Emergency Coordinator will ensure that the receiving vessel is compatible with the materials to be transferred to it and that there are no incompatible materials in the receiving vessel which could react with the waste to be transferred.

The secondary containment surrounding and/or the spill pond adjacent to the licensed facility and 90-day hazardous waste tank storage areas have the capacity to hold the contents of the largest tank and the precipitation incident to the secondary containment system that would result from 24 hours of a 25-year rainfall event. After a spill is detected, it will be removed within 24 hours and any hazardous waste properly disposed of at an appropriately licensed off-site hazardous waste facility. The cause of the spill or leak will be determined and the tank or ancillary equipment will be repaired, if necessary, in a timely manner.

d. Isolation Distance

If a spill of hazardous waste occurs outside a secondary containment or sump area, an area of isolation will be established around the spill. The size of the area will generally depend on the size of the spill and the materials involved. If the spill is large and involves a tank or a pipeline rupture, an initial isolation distance of at least 100 ft in all directions will be established. In the case of small spills or leaks from a tank or auxiliary equipment, the immediate area will be evacuated to prevent exposure and to allow for cleanup and repair. When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. Where possible the affected area will be roped or otherwise blocked off.

e. Vapor Releases

If a hazardous waste spill or a release of hazardous waste constituents' results in the formation of a toxic vapor cloud, further evacuation of persons downwind may be required. If the Loss Prevention Incident Commander determines that Dow Corning or outside contractors are unable to handle the emergency, then local, State, and Federal emergency response authorities will be notified of the situation. Evacuation of all potentially affected plant areas will be initiated as soon as possible by Loss Prevention Department personnel.

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)]

If the plant or licensed facility ceases operations in response to an emergency, the Loss Prevention Incident Commander or designee will monitor valves, pipes, and other equipment for leaks, pressure build up, gas generation or ruptures. Since there is no process equipment in the licensed facility, cessation of operations there would consist of shutting down all waste transfer operations in the tank storage area. This will ensure that there will be no overfilling and will minimize the possibility of a spill from the tanks.

Each hazardous waste storage tank in the plant and licensed facility is provided with an emergency pressure relief valve to prevent hazardous buildup of pressure, and with a pressure gauge by which the tank pressure may be monitored. The Production Incident Commander or designee will monitor the pressure in the waste storage tanks unless access to the tanks is not safely possible due to the nature of the emergency.

If there is a fire in or near any hazardous waste container storage or tank storage area, adjacent containers or tanks not directly involved in the fire will be cooled with water spray to prevent hazardous pressure buildup, if the Loss Prevention Incident Commander determines this is advisable. Containers will be observed for signs of pressure buildup, including bulging of the sides, top or bottom, discoloration, and emitting a hissing or whistling sound.

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)]

Contaminated soil and/or water, and released materials recovered during emergency response operations may be stored in the container storage or tank storage areas of the licensed facility prior to being shipped off-site for treatment or disposal at appropriately licensed facilities. These materials will be properly characterized and identified as appropriate to the type of waste and the container used. Incompatible materials will not be commingled in a way which could cause an uncontrolled reaction which could result in a fire, explosion or release. All contaminated soil, water and recovered hazardous wastes will be placed in tanks or containers constructed of materials compatible with the wastes placed in them.

The Emergency Coordinator will ensure that wastes which may be incompatible with the released material are not treated, stored or disposed in the area of the release until cleanup procedures are completed. This may be accomplished by removing the incompatible materials to a secure location remote from the released material, shipping the materials off-site for storage or disposal, or establishing temporary dikes within the waste management area.

The Emergency Coordinator will also ensure that incompatible wastes removed during cleanup operations are not packaged or commingled with other materials that might create a reaction, causing fire, explosion, buildup of pressure, or release of toxic or flammable vapors.

A7.D.8 Procedures for Cleanup and Decontamination

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

Emergency equipment used during emergency response operations will be replaced or decontaminated and thoroughly cleaned after use and before being returned to its normal location prior to resumption of normal operations. All emergency equipment used will be examined for damage and repaired, if necessary, before being returned to its normal storage location and before resumption of normal operations. If any equipment cannot be adequately repaired so that it could be used for its intended purpose, it will be replaced with the same or equivalent equipment prior to resumption of operations. Before operations are resumed, an inspection of all safety equipment will be conducted as discussed in Module A5 (Inspection Schedules). The Emergency Coordinator will verify that post-emergency equipment maintenance has been performed and operations at the facility will be resumed.

Any emergency response supplies, such as absorbent materials and personal protective equipment, which have been used up, discarded or otherwise rendered no longer available, will be replaced to an adequate stock level prior to resumption of normal operations. See Appendix A7-5 for locations and amounts of emergency equipment and supplies maintained at Midland site.

A7.E NOTIFICATION AND RECORD KEEPING REQUIREMENTS

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

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 of Operations

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

Before operations are resumed, an inspection of all emergency equipment will be conducted. The Emergency Coordinator must notify the U.S. EPA, Department of Natural Resources and Environment (DNRE), and local authorities that post-emergency equipment maintenance has been performed and operations at the facility will be resumed. See Table A7-3, and Section A7.D.8 and Section A7.E(2)(b) of this Module.

A7.E.2 Record Keeping Requirements

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

A7.E.2(a) Operating Record

In the event of an emergency situation that requires implementation of the Contingency Plan, the Emergency Coordinator will record in the facility's operating record the time, date, and description of the event. The operating record is maintained by Dow Corning and can be found at the facility's records retention center.

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

Within 15 days of an incident requiring implementation of the Contingency Plan, the Dow Corning facility will submit a written incident report to the U.S. EPA Regional Administrator and the Director of DNRE.

The report will contain the following information:

1. Name, address, and telephone number of the facility, and the owner/operator.
2. Date, time, and type of incident.
3. Type and quantity of materials involved.
4. Assessment of actual or potential hazards to human health and the environment.
5. Extent of injuries, if applicable.
6. Estimated quantity and disposition of recovered materials that resulted from the incident.

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

This contingency plan will be reviewed and amended whenever the Emergency Coordinator deems necessary and/or of one of the following conditions is met:

- The facility operating permit is revised;
- Applicable regulations are revised;
- The plan fails in an emergency;
- The facility changes in 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, or changes the response necessary in any emergency;
- The list of Emergency Coordinators changes; or
- The list of emergency equipment changes.

Whenever this Contingency Plan is amended, copies of the revised Plan will be sent to each of the recipients listed in Table A7-1, located at the end of this Section.

APPENDIX A7-1

**Documentation of Arrangements with Local
Authorities**

From: j.m.price@dowcorning.com [mailto:j.m.price@dowcorning.com]
Sent: Wednesday, November 18, 2009 2:41 PM
To: Vanderkam, Lori A.
Subject: FW: Midland Plant Contingency Plan -2009

Dow Corning Confidential - INTERNAL

Here is the confirmation the contingency plan was sent and delivered.

RC14001 Midland Plant Rep.
Environmental Specialist
Tel: (989) 496-6392
Fax: (989) 496-5457
email: j.m.price@dowcorning.com

From: Microsoft Exchange
Sent: Wednesday, November 18, 2009 2:38 PM
To: PRICE, JOHN M. (JMPRICE)
Subject: Relayed: Midland Plant Contingency Plan -2009

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

rbshook@dow.com

peterst@michigan.gov

gladwig@midland-mi.org

rgarner@co.midland.mi.us

john.shaffer@midmichigan.org

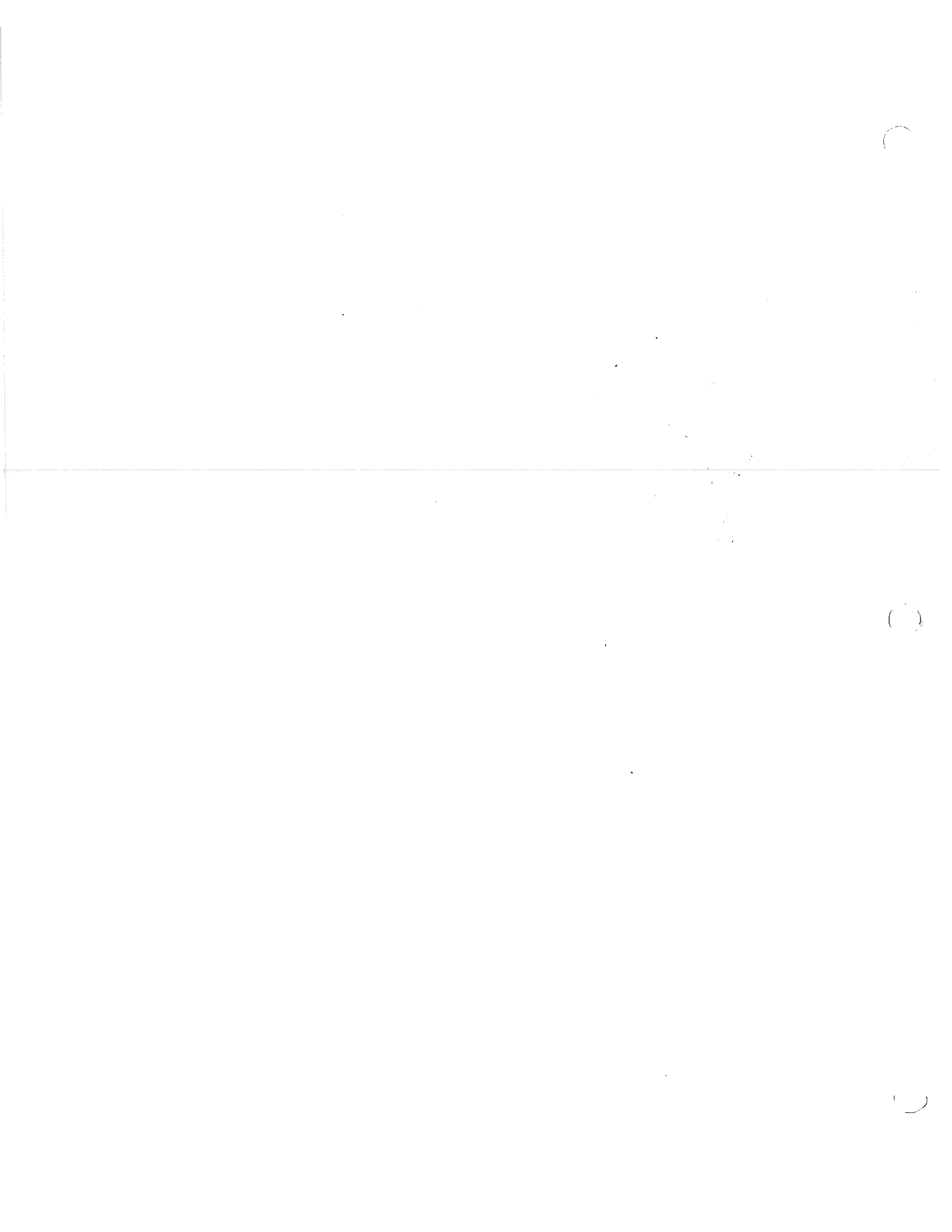
Igarcia@midland-mi.org

patty.szotko@midmichigan.org

Subject: Midland Plant Contingency Plan -2009

Sent by Microsoft Exchange Server 2007

Dow Corning Incident Classifications



Appendix A7-2

Dow Corning Incident Classifications

[excerpt from the Dow Corning Midland Site Emergency Response Plan]

Minor Incident

A Minor Incident is an event which involves a very small amount of a hazardous substance with emergency actions confined to the area immediately surrounding the source of the event.

This classification is used to designate small chemical spills, releases, or fires that will involve commitment of Loss Prevention Department resources.

Informational Call

An Informational Call is an event which is best described as a detectable cloud, unusual odor or detectable change from normal, as noticed at the Site fence line. This would also include unusually loud or distinct sounds emitted from the Site. For Informational Calls involving chemical releases, the chemical concentration at the fence line is below applicable exposure guidelines. The Threshold Limit Value (TLV) is typically used as the threshold level above which health effects may result due to over-exposure to the chemical.

Instructions are to be given about the events and forecast of duration to the community through the Midland County Central Dispatch in accordance with the Midland County Emergency Plan. Health hazard information should also be provided at the request of community authorities.

Site Emergency

A Site emergency is declared when more than neighboring buildings on Site are affected by the emergency event and the community is not exposed to chemical concentrations or other risks that would cause adverse health effects due to control measures being employed.

The Threshold Limit Value (TLV) is typically used as the level above which health effects may result due to over-exposure to the chemical. If the released material should extend into the community it may cause noticeable physiological reactions like tearing, coughing, itching, irritation, etc.

The Midland County Emergency Coordinating Center (ECC) will be partially activated during a Site emergency. Notification will also be made to certain public officials.

Once the incident is controlled, and it is assured that no material will enter the community above the TLV, the event is downgraded to an Informational Call.

If the release is of a lesser degree than described above it is an Informational Call.

Community Emergency

A Community Emergency occurs when the released material will or has entered the community at a level greater than the TLV OR the emergency poses physical harm to the community beyond the fence line such as in extensive fire or explosion incidents. It will or could cause physiological reactions, such as tearing, coughing, itching, irritation, etc. Public response information is necessary to protect the community and reduce panic and errant information.

The level of a chemical at the fence line is only one component in the decision to escalate an emergency to the Community Emergency level. Other issues need to be considered, such as the probability of escalation of the emergency, duration of the emergency, etc.

The Midland County Emergency Coordinating Center (ECC) will be fully activated and notification will be given to certain public officials.

Note that the Dow Corning Incident Commander or SEM can escalate and de-escalate emergencies in the Minor, Informational Call, and Site Emergency Levels. Once a Community Emergency is declared, however, it can only be cleared by mutual consent of the City Fire Chief and County Health Director as directed by the Midland County Emergency Plan.

A Community Emergency can not be downgraded by Dow Corning. We can downgrade our Site level of actions and readiness.

Community Notification

The community (through the Midland County Central Dispatch) is informed of all emergencies which are classified as minor, informational, site or community emergencies. The details of further notifications which are made by the Midland County Central Dispatch are contained in the Dow Corning Off-Site Plan and in the Midland County Emergency Plan.

If evidence suggests or confirms that a hazardous condition is actually leaving, or has the potential to leave, the site at or above health effects, a Community Emergency will be declared. The most important step is early notification to the community.

In this event, the Loss Prevention Dispatcher will communicate with Midland County Central Dispatch, who will then notify appropriate members of the local emergency response community in accordance with the Midland County Emergency Plan.

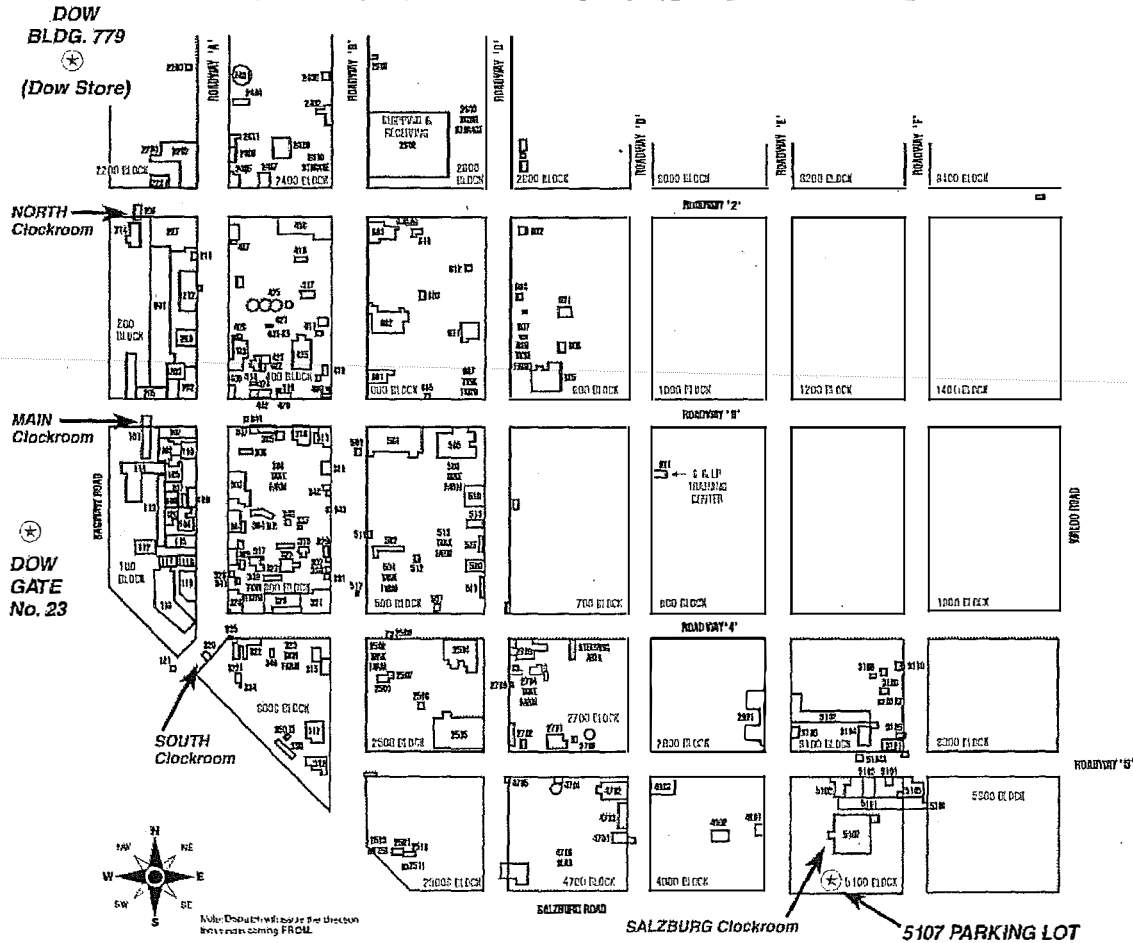
The Midland County Emergency Coordinating Center (ECC) works with all Township, City and County agencies in coordinating a response to an emergency. Dow Corning, through the Loss Prevention Department, will furnish people and equipment to work with the Midland County ECC to block off roads or warn people of the danger, when requested to do so, provided these resources are not needed at the Site.

APPENDIX A7-4

Evacuation Plan and Routes

Appendix A7-4 Evacuation Plan

DOW CORNING MIDLAND SITE



Bulletin boards in each building have the following information prominently posted:

1. Building consolidation location and procedures for sheltering in place;
2. Building evacuation location and procedures;
3. Site-wide evacuation points and procedures.

Site-wide evacuation exit points are at the four Clock Room gates marked on the site map above.

Midland Plant Standard Emergency Signals	
Plant Evacuation	Slow "whoop" audible signal and voice message
Building Evacuation	Repeating blasts on building air horn

APPENDIX A7-5

Emergency Equipment Description

**Appendix A7-5
Emergency Equipment**

Equipment Location	Description	Capabilities
4 at 809 Bldg, 2 at 806 tank farm, 1 at 804 truck wash area	7 fire hydrants with monitor nozzles	Provide water for firefighting at 300 to 750 gpm ¹
Buildings 801, 804, 805, 807, 808, 809, 811, & 806 tank farm	30 lb dry chemical fire extinguishers	Suppression of Class B&C fires: Flammable liquids & electrical
807 Bldg.	15 lb. CO ₂ fire extinguisher	Suppression of Class 2B & C fires: flammable liquids & electrical
808 Bldg	5 lb. CO ₂ fire extinguishers	Suppression of Class 2B & C fires: flammable liquids & electrical
808 Bldg	2½ gal. Pressurized water fire extinguishers	Suppression of Class A fires: trash, wood, paper
805 Bldg, 807 Bldg, 811 Bldg.	Eyewash/Safety showers	Remove contamination from body and eyes
810 Bldg	Fire sprinkler control booth	Control system for 809 Bldg
809 Bldg	Dry pipe fire sprinkler system	Provides water (or foam from truck connection) for fire suppression
2201 or 408 Building (Stock)	Supplied Air Respirators	Respiratory protection from toxic vapors
	Air Purifying Respirators	Respiratory protection from toxic vapors
808 Bldg	Self-contained breathing apparatus (SCBA): 30-min.	Respiratory protection from toxic vapors
Service Department - 2505 Bldg Phone 5306	55 gal. open head drum	Packaging waste from cleanup of spill or release
	55 gal. closed head drum	Packaging waste from cleanup of spill or release
	45 gal. fiber drum	Packaging waste from cleanup of spill or release
	85 gal. salvage drum	Overpack leaking containers

**Appendix A7-5
Emergency Equipment (continued)**

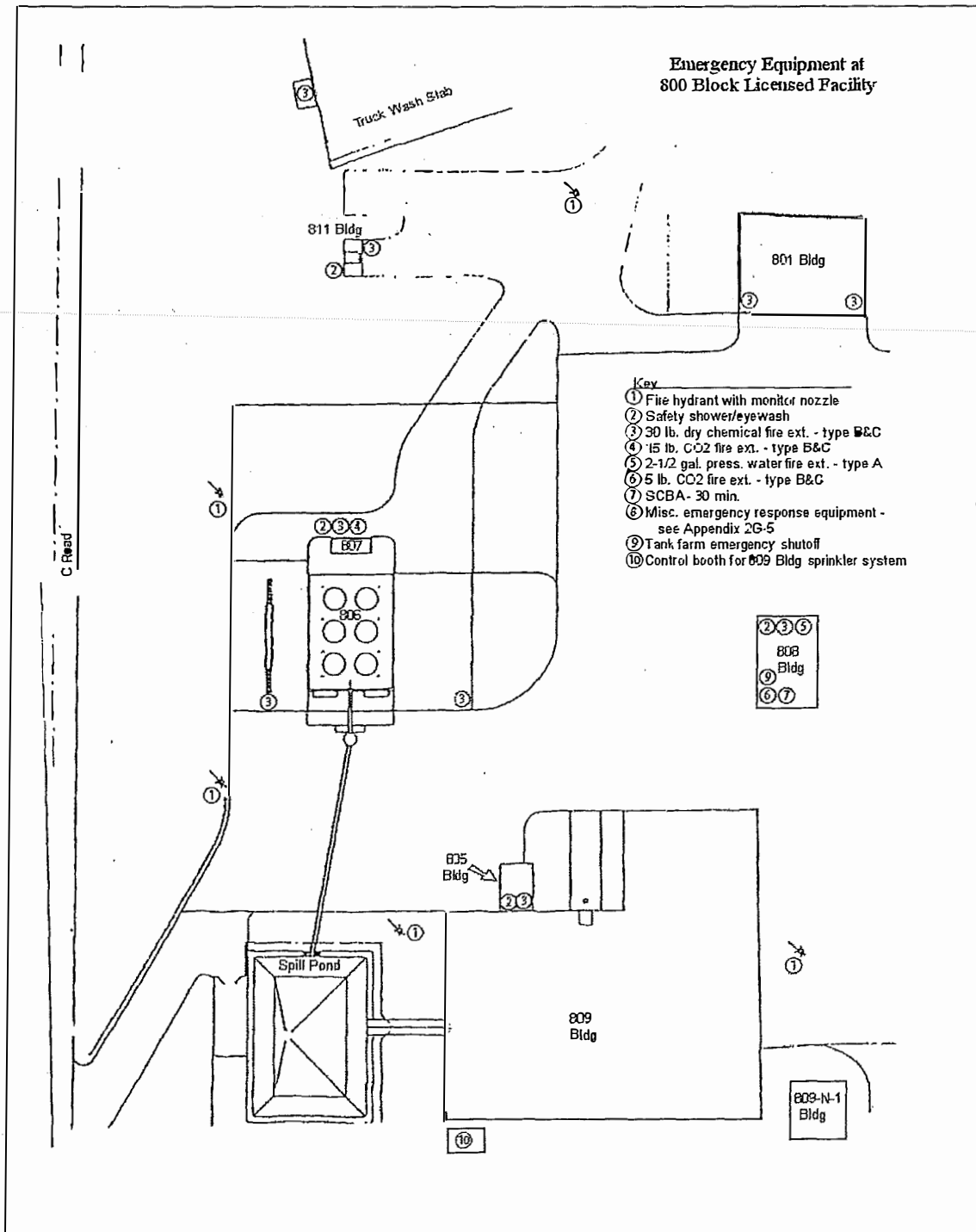
Emergency Equipment at 809-N-1 Emergency Response Building

Description	Capabilities
Sodium Bicarbonate, min.qty.= 5 Bags	Neutralize acid spills
8" X 10' Absorbent Booms For Land/Water, min.qty.= 200'	Absorb spilled liquids
Stakes For Above Booms 1/2" X 4', min.qty.= 6	Anchor absorbent booms
Rope For Stakes And Booms 3/8" X 20' (120 total feet) , min.qty.= 6	Anchor absorbent booms
9" X 9" Pillows For Sumps And Small Containments, min.qty.= 30	Absorb spilled liquids
Hazwik Socks For Hazardous Materials 48" X 3", min.qty.= 60	Absorb spilled liquids
18" X 18" Absorbent Pad, min.qty.= 100	Absorb spilled liquids
30" X 34" Absorbent Pad, min.qty.= 75	Absorb spilled liquids
Slikwik Ground Up Corn-Cob, min.qty.= 5 Bags	Absorb spilled liquids
Oil Dry, min.qty.= 5 Bags	Absorb spilled liquids
pH Paper, min.qty.= 6 Rolls	Test spills for corrosivity
Sample Bottles, min.qty.= 40	Sample spilled materials for analysis, if necessary
Plastic Shovels, min.qty.= 2	Collect spilled materials and contaminated soils for recovery or disposal
Drum Siphons , min.qty.= 10	Transfer liquids from leaking containers
Pail Siphons, min.qty.= 10	Transfer liquids from leaking containers
Barricade Tape, min.qty.= 6 Rolls	Restrict access to spill cleanup area

APPENDIX A7-6

Location of 800 Block Emergency Equipment

Appendix A7-6 Location of 800 Block Emergency Equipment



Appendix A7-7

**Checklist - Tracking Facility Response Actions
during and after a Fire/Explosion Incident**

Appendix A7-7
Dow Corning Corporation, Midland, Michigan
Part 111 Hazardous Waste Operating License
Checklist - Tracking Facility Response Actions during and after a Fire/Explosion Incident

The Contingency Plan (Module A7) and Dow Corning's Emergency Response Plan establishes the procedures to be followed in the event of an emergency situation at the Dow Corning Corporation (Dow Corning) facility in Midland, Michigan. The Emergency Response Plan is not included in this permit application, however will be available upon request. See below for information on response actions for the Dow Corning Facility.

1. Record Incident Parameters <i>Owner/Operator - As soon as access is available to employees/witnesses</i>	
<u>Dow Corning Reference</u>	<u>ACTION</u>
Module A7 - Contingency Plan, Section A7.D.1	(a.) Document the time the incident began and the duration of the overall event. Identify the specific location(s) where the incident began.
Module A7 - Contingency Plan, Section A7.D.1	(b.) Identify employees/witnesses having direct involvement or direct knowledge of the incident.
Module A7 - Contingency Plan, Section A7.D.1	(c.) Identify any relevant witnesses to the event.
Emergency Response Plan, Section 5.3	(d.) Gather local meteorological data from the National Weather Service (point-specific data are available at the National Oceanic and Atmospheric Administration [NOAA] Web site) and any characteristics noted by personnel directly involved with the incident or recorded elsewhere.
2. Develop Event Narrative <i>Owner/Operator - As soon as access is available to employees/witnesses</i>	
<u>Dow Corning Reference</u>	<u>ACTION</u>
Module A7 - Contingency Plan, Section A7.D.1- D.3, and A7.E(2) & Appendices A7-5 and A7-6	(a.) Determine the sequence of events and time line leading up to and throughout the incident by reviewing with employees directly involved, other on-site peripheral witnesses (office staff, truck drivers, maintenance staff, etc.), and access other tools and resources, as available (automated data records, surveillance cameras, etc.).
Module A7 - Contingency Plan, Appendix A7-3 (SPCC Plan, Section 6)	(b.) Identify specific event locations, materials, and equipment involved in the incident.
Module A7 - Contingency Plan, Section A7.E(2) & Appendix A7-3, (SPCC Plan, Section 6)	(c.) Identify and characterize, to the extent possible, the size and scope of the event.

Appendix A7-7
Dow Corning Corporation, Midland, Michigan
Part 111 Hazardous Waste Operating License
Checklist - Tracking Facility Response Actions during and after a Fire/Explosion Incident

3. Develop a Comprehensive List of Materials or Substances Involved
Owner/operator in combination with regulatory and health agencies and hazardous materials (hazmat) response teams - As soon as possible

<u>Dow Corning Reference</u>	<u>ACTION</u>
Module A7 - Contingency Plan, Section A7.D.1 and A7.E(2)	(a.) Identify all of the materials/substances that may have been involved in the event, using the information obtained in the previous steps, inventory records and/or container/tank logs, laboratory data, approval records, material safety data sheets, or any other means available. Use a generic list initially, and then develop a final list from off-site records. Verify that the most up-to-date records are used.
Module A7 - Contingency Plan, Section A7.D.1	(b.) Determine the volume, concentration, and weight of substances identified above, and determine how they may have been altered by the event (e.g., pyrolysis products, decomposition, degradation, and both known and potential mixture reactions). Based on this information, begin developing a list of compounds of potential concern.
Module A7 - Contingency Plan, Section A7.D.3	(c.) The Waste and Hazardous Materials Division (WHMD) shall identify the primary location where information and documents used to in previous steps 3.1 and 3.2 will be housed and ensure that information critical to response an activity is kept in that location.

4. Air Monitoring During Incident
Owner/operator (if the facility is equipped with monitoring instruments), in combination with Federal (Environmental Protection Agency - EPA, National Oceanic and Atmospheric Administration - NOAA) and local hazmat response teams - As soon as can be mobilized

<u>Dow Corning Reference</u>	<u>ACTION</u>
Module B4 - Environmental Assessment, Section B4.B.1(b) & Appendix B4-1	(a.) If possible, model dispersion and deposition of the release with real time parameters to determine likely extent of plume and to assist local authorities making shelter-in-place or evacuation recommendations.
Module A7 - Contingency Plan, Section A7.D.3	(b.) Establish air monitoring equipment in locations upwind and downwind of the incident (assign locations as soon as possible, using visual/meteorological data and update, as needed, with modeling results). Monitoring should continue until downwind data is consistent with upwind values.
Module A7 - Contingency Plan, Section A7.D.3	(c.) Air monitoring should be conducted utilizing approved methods and should include as many of the identified substances as possible. In the event of a fire/explosion, continuous particulate matter less than 2.5 microns in diameter (PM _{2.5}) should be monitored as well. The Contingency Plan should indicate what kind of monitoring equipment may be necessary (e.g., PM _{2.5} meters for fire events, SUMMA canisters/Tedlar bags for volatile organic compounds released from ruptured tanks), and which ones will be readily available.

Appendix A7-7
Dow Corning Corporation, Midland, Michigan
Part 111 Hazardous Waste Operating License
Checklist - Tracking Facility Response Actions during and after a Fire/Explosion Incident

5. Post-Incident Sample Collection <i>Owner/Operator, in combination with EPA, Michigan Department of Environmental Quality (MDEQ), Department of Community Health (DCH) - During and/or immediately following the incident</i>	
Dow Corning Reference	ACTION
A Sampling and Analysis Plan (SAP) will be developed post-incident.	(a.) Develop a sampling plan for the collection of waste, groundwater, soil, ash, airborne dust, debris, surface water, and/or wipe samples, as appropriate. The plan, or the need for one, may take into account fallout density, air monitoring data, visual observation, or air modeling. A statistical sampling design may not be necessary for the screening evaluation. Post-incident, off-site sampling may not be necessary based on air monitoring data and lack of off-site migration or deposition.
Sampling specifics will be covered in post-incident SAP.	(b.) Collect a sufficient number of samples to identify and characterize concentrations of substances involved in the incident. Include sampling for background concentrations.
	(c.) Complete the analysis of collected samples and review by comparison to relevant screening levels. Screening levels may have to be developed for some chemicals or environmental media.
	(d.) Identify and document any substances found to be present in levels that exceed screening levels.
6. Evaluate Data for Screening Potential Risk Yes/No (determines next step) <i>Owner/Operator – As soon as possible</i>	
Dow Corning Reference	ACTION
Sampling and reporting specifics will be covered in the post-incident SAP	(a.) Screen existing data against relevant screening levels.
	(b.) Prepare RA Screening Report and submit it to the MDEQ WHMD, for review as soon as possible but no more than 90 days after the incident.
	(c.) If less than screening levels, no further action is needed for off-site potential releases upon approval of the WHMD.
	(d.) If greater than screening levels, proceed immediately to Step 7.0, after notification from the MDEQ.

Appendix A7-7
Dow Corning Corporation, Midland, Michigan
Part 111 Hazardous Waste Operating License
Checklist - Tracking Facility Response Actions during and after a Fire/Explosion Incident

7. If Needed, Conduct off-Site RCRA Facility Investigation (RFI) and Prepare Full Remedial Action (RA) Report - Owner/Operator (Steps 7.(b.) through 7.(c.) to be completed within 180 days, if at all possible)	
Dow Corning Reference	ACTION
RFI Work Plan will be prepared post-incident if necessary.	(a.) Prepare off-site RFI Work Plan and submit for review to the WHMD. Submit within 30 days from step 6.(d.) notification from the MDEQ.
	(b.) Commence RFI immediately after MDEQ approval of step 7.1 RFI Work Plan.
	(c.) Conduct a RA on RFI data.
	(d.) Prepare and submit RFI Report to the WHMD.
Corrective Measures Study (CMS) and Corrective Measures Implementation (CMI) Plans will be prepared post-incident if necessary	(e.) Upon MDEQ approval of RFI, prepare a combined CMS and CMI Plan, and submit for review to the WHMD, if directed.
	(f.) Upon MDEQ approval of the CMS/CMI, implement the CMI Plan as directed.
	(g.) Provide a report to the DEQ upon completion of the CMI Plan.