

ATTACHMENT 9

CONTAINERS

**FORM EQP 5111 ATTACHMENT MODULE C1
USE AND MANAGEMENT OF CONTAINERS**

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.

R 299.9614 of 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 29.4101 to R 29.4505 promulgated pursuant to the provisions of the Michigan Fire Protection Act, PA 207, as amended (Act 207); and Title 40 of the Code of Federal Regulations (CFR) §§270.14(d), 270.15, and Part 264, Subpart I, establish requirements for the use and management of containers. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application module addresses requirements for the use and management of containers at the Dow Corning Corporation in Midland, Michigan. This module addresses the condition of containers, compatibility of waste with containers, management of containers, inspections, containment, special requirements for ignitable or reactive waste, special requirements for incompatible wastes, and closure.

(Check as appropriate)

Operating License Applicant:

R 299.9614 use and management of containers

Construction Permit Applicant:

R 299.9614 use and management of containers

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INTRODUCTION

This module demonstrates how Dow Corning Corporation (Dow Corning) will meet the performance standards for containers and container storage areas.

C1.A DESCRIPTION OF CONTAINERS [R 299.9614 and 40 CFR §264.171]

Wastes generated at the Midland plant are picked up from the generating locations and transferred to the licensed facility on pallets via industrial lift truck, flatbed trailer, or closed van trailer. Containerized hazardous wastes generated at other locations majority owned by Dow Corning generally arrive by flatbed or van trailer. Types of containers used for transporting hazardous wastes include steel, plastic and fiber drums and pails, and portable tanks of various capacities. All containers used for storage and off-site shipment of hazardous wastes meet all applicable U.S. Department of Transportation (U.S. DOT) requirements.

Hazardous wastes are stored in drums and intermediate bulk containers in the 809 Building. Wastes are also stored in thirty 90-day generator storage areas. Wastes are also stored in the wastewater tanker parked in the tanker storage area adjacent to the 806 tank farm, and in roll-off boxes used in the dewatering area, which are not part of the licensed facility. The 801 Building is only used for non-RCRA regulated wastes. See Appendix C1-1 for complete drawings of these areas and structures.

All containers used for storage of hazardous wastes at this facility meet applicable U.S. Department of Transportation requirements for the types of materials that they contain. The types of containers used for storage of wastes typically include, but are not limited to, the following:

- Steel drums of capacities from 5 gallons to 110 gallons.
- Fiber drums of capacities from 5 gallons to 110 gallons.
- Plastic drums of capacities from 5 gallons to 110 gallons.
- Intermediate bulk containers (IBCs), also known as portable tanks, or "totes", of capacities from 200 gallons to 500 gallons.
- Portable pressure vessels, typically of 750 gallons capacity, also, known as "Dempsters" for the commercial brand of container customarily used at Dow Corning. These containers are typically used to transport silanes and solvents within the Midland plant, including transporting silane and solvent wastes to the licensed facility.
- Cubic yard boxes and bags, also known as "Gaylord boxes" and "Supersacks", of approximately one cubic yard capacity each.
- Fiberboard cartons containing small consumer packages of various Dow Corning products, such as caulking tubes, aerosol cans of sealants, cans or bottles of coatings, and similar materials returned to Dow Corning from customers and distributors because they are off-spec, past their shelf life, or otherwise not usable for their intended purpose.

- Activated carbon adsorption units of various sizes and shapes, which are designed to function as treatment units for purification of process vent emissions or liquid streams. These units contain spent activated carbon and are typically returned to the activated carbon supplier for regeneration of the carbon for reuse. Smaller capacity units, ranging from 55 gallons to several cubic yards are stored within the 801 or 809 container storage buildings. The larger units, typically from a few cubic yards to as much as 30 cubic yards in capacity, are stored for less than 90 days in the tanker loading area pending shipment off-site. All such units meet applicable U.S. DOT requirements for shipping containers.

All containers used for storage of hazardous wastes at this facility are chosen for compatibility with the wastes they contain. Dow Corning's databases of material information and packaging documentation, and formal written procedures for approval of process and compositional changes ensure that close scrutiny is given to selection of appropriate container types for all materials. See Table A2-1, Hazardous Waste Generated and Accepted at the Facility, for the wastes stored in containers.

Containers of hazardous wastes in storage at this facility are kept securely closed at all times during storage except to add or remove waste. Containers of hazardous wastes are not opened, handled, transported, or stored in a manner which may rupture the container or cause it to leak.

Smaller, non-bulk containers are stored on pallets to facilitate their movement with forklifts and minimize the risk of damage. Larger, intermediate bulk containers, such as IBC and Gaylord (yard) boxes, are typically constructed with forklift channels or are skid-mounted to facilitate safe movement. Non-bulk (containers less than or equal to 119-gallons in size) and intermediate bulk containers of hazardous wastes are not stacked more than two containers high.

In its current facility operating license Dow Corning is authorized to store up to 85,000 gallons of hazardous wastes, or up to 1,818 containers. The same volumetric storage capacity is requested for the new license. To allow for flexibility in operations, the total physical capacity of the two buildings exceed the requested permitted capacity, as shown in the calculations presented below. At no time, however, will the total quantities of hazardous wastes in storage in the two buildings exceed the requested limitations of 85,000 gallons and/or 1,818 containers.

801 Building

Waste containers stored in the 801 and 809 container storage areas are arranged in rows one pallet wide, with a minimum aisle space of three feet between rows to allow for free access for inspection and free passage of emergency response equipment. This building has sufficient room for 6 40-foot rows of pallets with three foot aisles on each side and a 16 foot main aisle, as shown on Figure C1-1. Calculating on the basis that the typical containers in storage are 55-gallon steel drums and 47-gallon fiber packs, both of which are stored four containers per pallet, the total capacity for containers in the 801 building, with adequate aisle space is:

$$6 \text{ rows} \times 10 \text{ pallets/row} \times 8 \text{ containers/pallet} = 480 \text{ containers}$$

Dow Corning therefore requests authorization to store up to 480 containers in the 801 Building container storage area. Calculating total volumetric capacity based on the use of 55-gallon

drums, the total storage volume for the 801 Building container storage area is:

$$480 \text{ drums} \times 55 \text{ gallons/drum} = 26,400 \text{ gallons}$$

Dow Corning therefore requests authorization to store a maximum of 26,400 gallons in 480 containers of wastes in containers in the 801 Building container storage area. Storage in 55-gallon drums is used here as a typical example, but other containers are also used in this area as explained above.

809 Building

Rows of pallets in 809 Building are typically 44 feet long, with minimum three foot aisle space between, and main aisles 20 feet wide to permit forklift access. Allowing for adequate aisle space there is sufficient room for 24 rows of pallets, with 11 pallets in each row, double stacked, as shown on Figure C1-2. Calculating on the basis that the typical containers in storage are 55-gallons steel drums and 47-gallon fiber packs, both of which are stored eight containers per pallet (assuming the pallets to be 4 feet x 4 feet), the total capacity for containers in the 809 building, with adequate aisle space is:

$$24 \text{ rows} \times 11 \text{ pallets/row} \times 8 \text{ containers/pallet} = 2,112 \text{ containers}$$

Calculating total volumetric capacity based on the use of 55-gallon drums, the total storage volume for the 809 Building container storage area is:

$$2,112 \text{ drums} \times 55 \text{ gallons/drum} = 116,160 \text{ gallons}$$

The 809 building therefore has sufficient physical capacity to store the entire requested facility non-bulk container storage capacity of 85,000 gallons in the 809 Building. Storage in 55-gallon drums is used here as a typical example, but other containers are also used in this area as explained above.

The capacity figures presented above are used to illustrate that sufficient physical capacity exists to allow for flexibility in how the total licensed capacity can be accommodated. At no time will the total requested storage capacity for 801 and 809 Buildings of 85,000 gallons or 1,818 containers be exceeded.

C1.B CONDITION OF CONTAINERS

[R 299.9614 and 40 CFR §264.171]

All containers stored are properly labeled and in good condition and are free from leaks, severe rusting, or structural defects. Hazardous waste containers in storage are inspected at their time of arrival at the facility and at least weekly, while they are in storage. If any leak, significant rust, or serious structural defect such as a crease or large dent, is discovered, the container is removed from storage and either over-packed in another container which is in good condition and which is compatible with the waste, or the contents of the container are transferred to another container which is in good condition and is compatible with the wastes. In either case, the new container is then securely closed and properly labeled before being placed into storage. In the event that container repackaging is necessary due to container corrosion, damage, or leakage, the hazardous waste from this container will be transferred to a container in good

condition.

C1.C COMPATIBILITY OF WASTE WITH CONTAINERS

[R 299.9614 and 40 CFR §264.172]

All containers used for storage of hazardous wastes at this facility are chosen for compatibility with the wastes they contain. Dow Corning's databases of material information and packaging documentation, and formal written procedures for approval of process and compositional changes ensure that close scrutiny is given to selection of appropriate container types for all materials.

C1.D MANAGEMENT OF CONTAINERS

[R 299.9614 and 40 CFR §264.173]

All containers used for storage of hazardous wastes at this facility meet applicable U.S. Department of Transportation requirements for the types of materials that they contain. All containers are properly labeled and in good condition and are free from leaks, severe rusting, or structural defects. The containers are labeled or marked properly and clearly with the words "Hazardous Waste" and the hazardous waste number in accordance with 40 CFR 262.34. For containers holding non-hazardous wastes, a "Non-Hazardous Waste" label is affixed to the container to indicate its contents.

Hazardous containerized wastes are properly characterized to ensure that the wastes can be safely stored, and eventually transferred for outside disposal. Rejected waste shipments are returned to the generator. Accepted containers are placed in storage where they will remain sealed until they are removed for shipment or bulking, unless unusual circumstances require that the drum be opened again.

Containers holding hazardous waste are always closed during storage, except when it is necessary to add or remove waste. Containers will be opened, handled, and stored in such a way that will not rupture the containers or cause them to leak.

No waste is commingled with another waste from a different subgroup without first evaluating the compatibility of the mixture either by review of available information on the wastes to be commingled or by testing. During storage, sufficient aisle space is maintained to provide unobstructed movement of personnel, fire protection equipment, and spill control/decontamination equipment to any area of facility operation during an emergency. Container labels face the aisle and are clearly visible. In order to detect spills or leaks and to prevent the containers from contacting any standing liquids, the containers are stored directly on top of pallets in good condition, stacked no more than two high.

All containers are opened, handled, and stored in such a manner as to prevent instability of the container. All containers are placed on level surfaces if not being transferred. Containers are opened by trained personnel only.

C1.E INSPECTIONS

[R 299.9614 and 40 CFR §264.174]

Hazardous waste containers in storage are inspected at their time of arrival at the facility and at least weekly, while they are in storage. Storage of the containers on pallets facilitates inspection of the container storage area for leaks. If the inspection identifies an unsatisfactory condition, such as an actual release or the potential for release, remedial actions as specified in the Contingency Plan (Module A7) will be promptly implemented. If any accumulated liquids are detected, they will be promptly removed within 24-hours. These liquids will be placed in containers and stored for ultimate disposal.

See Module A5 and Appendix A5-1 for further details on inspections.

C1.F CONTAINMENT

[R 299.9614 and 40 CFR §§264.175 and 270.15]

See Appendix C1-2 for drawings on secondary containment for the container storage area.

C1.F.1 Secondary Containment System Design and Operation for Containers with Free Liquids

[R 299.9614 and 40 CFR §§264.175(a) and 270.15(a)]

C1.F.1(a) Requirement for Base or Liner

[R 299.9614 and 40 CFR §§264.175(b)(1) and 270.15(a)(1)]

All secondary containment for container storage areas at this facility, except for the spill pond, is constructed of reinforced concrete and sealed with an epoxy coating compound that is resistant to solvents as well as most acids and bases. Expansion joints in the concrete slabs are provided with chemical resistant water stops.

The spill pond is constructed of clay and sand and is lined with HDPE sheets that are heat welded to form a continuous barrier against liquids migrating to the soil. Underlying the spill pond is a system of leak collection piping which is designed to intercept any liquids that might leak from the spill pond. These pipes drain to a manhole where they can be inspected to determine whether the spill pond is leaking. The manhole is equipped with a pump for removal of accumulated liquids to the chemical sewer for treatment and disposal. See Appendices C1-1 and C1-2 for drawings showing the design and construction of the spill pond.

C1.F.1(b) Containment System Drainage

[R 299.9614 and 40 CFR §§264.175(b)(2) and 270.15(a)(2)]

801 Building

The 801 Building is a 2,748 square foot structure with a sloped roof and enclosed on three sides. The container storage area's floor is constructed of reinforced concrete of six-inch minimum thickness and has varying pitch, with a minimum slope of one inch in eight feet. The floor is sloped downward to rear of the building and to the northwest, as shown on the drawing (X1-38058) provided in Appendix C1-2. Containers of wastes are stored on pallets to ensure

that they do not come into contact with spilled liquids.

809 Building

The 809 Building is a 5,886 square foot building, including the 384 square foot loading dock annex designated as 805 Building. Because this loading dock annex is attached to the 809 Building and under the same roof and is used in the normal operations carried out in the 809 Building, for the sake of this description it will be considered to be part of 809 Building. The floor of this building is constructed of reinforced concrete with a minimum thickness of nine inches and is sealed with an epoxy coating compound that is resistant to solvents and most acids and bases. The floor of the storage area slopes downward to the center. Containers of hazardous wastes are stored on pallets to ensure that they do not come into contact with spilled liquids.

As shown in the drawing (X1-35726) provided in Appendix C1-2, the floor of the 809 Building container storage area is sloped to the center of the building with a pitch of one inch in 17 feet, and to the western end of the building, with a pitch of one inch in 10 feet. This causes liquids to accumulate at the drainage trough at the western end of the containment, which then channels any liquids to the spill pond.

C1.F.1(c) Containment System Capacity [R 299.9614 and 40 CFR §§264.175(b)(3) and 270.15(a)(3)]

The containment system has ample capacity to contain potential releases from the 801 building, 809 building, the 806 tank farm, the tanker storage area and the tanker loading areas.

801 Building

The total containment capacity of the 801 Building container storage area secondary containment, calculated from the dimensions shown for this structure on the drawing in (X1-38058) provided in Appendix C1-2, is 4,543 gallons. If it is assumed that all containers stored in this area may contain free liquids, this is sufficient containment capacity for 45,430 gallons of wastes in containers, based on the requirement that the containment capacity must be at least 10% of the total maximum quantity in storage. This quantity is equivalent to the capacity of 832 55-gallon drums. The requested storage capacity of the 801 Building is 480 containers, or 26,400 gallons, so the containment capacity provided is more than adequate.

809 Building

Containment capacity for the 809 Building container storage area is provided by the 800 Block spill pond, which has a containment capacity of 142,000 gallons, calculated based on the dimensions shown in the spill pond drawing provided in (Y1-35727) in Appendix C1-2. See below, for the determination of containment capacity of the spill pond.

Spill Pond

The spill pond in the 800 block provides secondary containment capacity for the 806 tank farm, the 809 Building container storage area, the wastewater tanker storage area, and for the tanker loading areas adjacent to the 806 tank farm. The spill pond has a total capacity of 142,000

gallons as calculated based on the dimensions shown in the spill pond drawing (Y1-35727) in Appendix C1-2.

As shown on the drawing (Y1-45401) in Appendix C1-2, the spill pond receives accumulated runoff from the 806 tank farm and the paved areas surrounding it, including the tanker loading areas, as well as from the paved area immediately surrounding the pond. The total surface area receiving precipitation, including the flumes from the 806 tank farm and 809 Building, and the pond itself, is 15,300 square feet. According to information provided by the Midland City Wastewater Treatment Department, in the Midland area a 100-year rainfall event will deposit 3.9 inches of water in 24 hours. The volume of runoff water from this area to the spill pond from such an event is:

$$15,300 \text{ ft}^2 \times (3.9 \text{ in.}/12 \text{ in./ft}) \times 7.48 \text{ gal/ft}^3 = 37,194 \text{ gallons}$$

The remaining capacity to contain spills is:

$$142,000 - 37,194 = 104,806 \text{ gallons}$$

Because the spill pond serves as containment capacity for the 806 tank farm, as well as the 809 Building container storage area and the wastewater tanker, the total capacity required is the sum of the requirements for each area, as follows:

806 tank farm: largest tank, or 10% of total tank volumes, whichever is larger

Largest tank = 10,000 gallons

Total tank capacity = 60,000 gallons x 10% = 6,000 gallons

Capacity required = 10,000 gallons

809 Building: largest container or 10% of total volume of all containers

Largest container = 750 gallons

Total requested storage = 121,000 gallons x 10% = 12,100 gallons

Capacity required = 12,100 gallons

Wastewater tanker: capacity (maximum) = 6,500 gallons

Capacity required = 6,500 gallons

Total containment capacity required:

$$10,000 + 12,100 + 6,500 = 28,600 \text{ gallons}$$

This is only 27% of the total capacity available, after allowing for precipitation, so the spill pond has about three and a half times the required capacity. Adequate spill containment is therefore provided.

C1.F.1(d) Control of Run-on

[R 299.9614 and 40 CFR §§264.175(b)(4) and 270.15(a)(4)]

Control of run-on into the 809 Building container storage area is provided on all sides, except at the north end overhead doorways, by a concrete curb six inches in height. At the north doorways the exterior parking lot is sloped away from the building to prevent run-on. See Module A6, Section A6.G for details.

C1.F.1(e) Removal of Liquids from Containment System
[R 299.9614 and 40 CFR §§264.175(b)(5) and 270.15(a)(5)]

Due to the slope of the floor in the 809 Building secondary containment, liquids flow by gravity to the flume (sloped channel) which leads to the spill pond. From the spill pond, liquids are pumped to the chemical sewer for treatment and disposal within 24-hours.

C1.F.2 Secondary Containment System Design and Operation for Containers with No Free Liquids
[R 299.9614 and 40 CFR §§264.175 and 270.15(b)(1)]

All containers of hazardous wastes managed at this facility may contain free liquids and are handled and stored as though they do contain free liquids. All containers of hazardous wastes are stored in areas provided with secondary containment meeting the requirements of 40 CFR 264.175(b).

C1.F.2(a) Containment System Drainage
[R 299.9614 and 40 CFR §§264.175 and 270.15(b)(2)]

All containers of hazardous wastes managed at this facility may contain free liquids and are handled and stored as though they do contain free liquids. All containers of hazardous wastes are stored in areas provided with secondary containment meeting the requirements of 40 CFR 264.175(b).

C1.F.2(b) Container Management
[R 299.9614 and 40 CFR §§264.175 and 270.15(b)(2)]

All containers of hazardous wastes managed at this facility may contain free liquids and are handled and stored as though they do contain free liquids. All containers of hazardous wastes are stored in areas provided with secondary containment meeting the requirements of 40 CFR 264.175(b). Storage on pallets keeps the containers off the floor so that, in case of a leak from a container, other containers of incompatible wastes will not come into contact with the leaked material.

C1.G SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE
[R 299.9614 and 40 CFR §§264.176 and 270.15(b)(2)]

All containers storage areas at this facility are located approximately 1,000 feet from the nearest property line, which is northeast of the landfill. This exceeds the requirement that containers of ignitable and/or reactive wastes be stored least 50 feet (15 meters) from the nearest property line (see Site Plan Appendix A1-1).

Containers of incompatible wastes stored in the 809 Building container storage area are separated by being stored on separate pallets and in separate aisles. Storage on pallets keeps the containers off the floor so that, in case of a leak from a container, other containers of incompatible wastes will not come into contact with the leaked material.

C1.H SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

[R 299.9614 and 40 CFR §§264.177(c) and 270.15(b)(2)]

Incompatible wastes are stored in the 809 container storage area, but are not commingled in containers. Wastes are not placed into containers that formerly contained an incompatible waste unless that container has been thoroughly cleaned first to remove all residues of the incompatible material.

Containers of incompatible wastes stored in the 809 Building container storage area are separated by being stored on separate pallets and in separate aisles and the approximate height of the containers is three feet. Storage on pallets keeps the containers off the floor so that, in case of a leak from a container, other containers of incompatible wastes will not come into contact with the leaked material.

Dow Corning's materials characterization database has sufficient information to determine which wastes are incompatible with each other. This information is readily available to facility employees and is used to prevent mixing of incompatible wastes which could lead to uncontrolled reaction, fire, or explosion.

Table C1-1, "Waste Compatibility Groups", located at the end of this section, contains a table of waste types handled at this facility. The wastes are identified by Dow Corning's internal "Q8" numbers and grouped according to compatibilities. No waste is commingled with another waste from a different subgroup without first evaluating the compatibility of the mixture either by review of available information on the wastes to be commingled or by testing.

If testing of compatibility is necessary, small, approximately equal portions of the two wastes are mixed and the mixture observed for reaction. If after 30 minutes there has been no ignition of the wastes, no noticeable emission of toxic or ignitable gases, and no temperature rise greater than 5° C. in 10 minutes, then the wastes are considered to be sufficiently compatible to be safely commingled.

C1.I CLOSURE

[R 299.9614 and 40 CFR §264.178]

The closure plan is in Section A11.

The 801 and 809 Buildings are used for storage of wastes in containers and will undergo closure as required at the end of its active service life, as described in this section. Post-closure care is not required for this unit because all wastes will be removed and all contaminated structures and equipment either removed or decontaminated during closure. Because this unit is situated on an inactive portion of the Dow Corning Midland site landfill, this area will be capped with the final landfill cover, and post-closure care for the landfill will include this area.

At closure, all hazardous waste and hazardous waste residues will be removed from the containment system. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed. See Module A11 for a more detailed description of closure activities.

**Table C1-1
Waste Compatibility Groups
Dow Corning Corporation, Midland, Michigan**

Type of Waste	EPA Codes	Q8 Numbers
Group 1: Ignitable and Reactive Liquids		
1.a. Chlorosilanes (Si-Cl compounds), vinyl silanes and acetoxysilanes, also containing any of the following: aromatic solvents, aliphatic hydrocarbons, chlorinated solvents, acetic acid, acetyl chloride	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F002, F003, F005 Michigan codes 001D, 003D, 002U, 041U	Q8-6011, Q8-6018, Q8-6118, Q8-6119
1.b. Alkoxysilanes (Si-O-CH ₃), containing aliphatic and aromatic solvents, alcohols	D001, D003, F003, F005	Q8-6062
1.c. Silanes (Si-H), also containing aliphatic, aromatic and/or chlorinated solvents, and/or other monomers, including acetonitrile	D001, D003, D039, F002, F003, F005	Q8-6061, Q8-6230
1.d. Silazanes and Aminosilanes, containing aliphatic and/or aromatic solvents	D001, D003, F003, F005	Q8-6204, Q8-6247
Group 2: Ignitable and Reactive Solids		
2.a. Solids, soils and/or debris containing chlorosilanes	D001, D003, D004, D005, D007, D008, D011, D018, D019, D021, D022, D035, D039, D040, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U008, U009, U019, U031, U035, U037, U040, U044, U045, U055, U056, U069, U075, U080, U092, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U123, U133, U134, U140, U144, U151, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan 001D, 003D	Q8-6172, Q8-6338, Q8-6339
2.b. Solids, soils and/or debris containing alkoxysilanes	D001, D003, F003, F005	
2.c. Solids, soils and/or debris containing silanes (Si-H)	D001, D003, D039, F002, F003, F005	Q8-6336
2.d. Solids, soils and/or debris containing silazanes and/or aminosilanes	D001, D003, F003, F005	
2.e. Magnesium solids	D001, D003	Q8-6337

Table C1-1 (continued)
Waste Compatibility Groups
Dow Corning Corporation, Midland, Michigan

Type of Waste	EPA Codes	Q8 Numbers
Group 3: Lab Packs		
3.a. Ignitable, acidic corrosive and reactive lab packs	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Q8-6038
3.b. Ignitable, basic corrosive lab packs	D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Q8-6117

**Table C1-1 (continued)
Waste Compatibility Groups
Dow Corning Corporation, Midland, Michigan**

Type of Waste	EPA Codes	Q8 Numbers
Group 3: Lab Packs (continued)		
3.c. Ignitable lab packs	D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F001, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Q8-6199
3.d. Acidic corrosive lab packs	D002, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, F001, F002, F003, F004, F005, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Q8-6200
Group 4: Ignitable, acidic corrosive wastes		
4.a. Ignitable, acidic corrosive liquids	D001, D002	Q8-6711
4.b. Ignitable, acidic corrosive solids	D001, D002	Q8-6246, Q8-6821

**Table C1-1 (continued)
Waste Compatibility Groups
Dow Corning Corporation, Midland, Michigan**

Type of Waste	EPA Codes	Q8 Numbers
Group 5: Solvent wastes		
5.a. Ignitable mixed solvents	D001, D018, D019, D021, D022, D035, D039, D040, F001, F002, F003, F004, F005	Q8-6017, Q8-6026, Q8-6116, Q8-6227, Q8-6504, Q8-6507, Q8-6509
5.b. Solvent contaminated solids	D018, D019, D021, D022, D035, D039, D040, F001, F002, F003, F004, F005	Q8-6323, Q8-6817, Q8-6821
5.c. Solvent contaminated water	D001, D018, D019, D021, D022, D035, D039, D040, F001, F002, F003, F004, F005	Q8-6320
Group 6: Discarded virgin raw materials		
6. Discarded virgin raw materials	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D035, D038, D039, D041, D042, P005, P022, P120, U002, U003, U006, U009, U009, U018, U019, U031, U035, U037, U040, U041, U044, U045, U055, U056, U069, U075, U080, U096, U103, U108, U112, U113, U115, U117, U120, U121, U122, U133, U134, U140, U154, U159, U161, U162, U165, U188, U210, U211, U213, U220, U223, U226, U228, U239, U328, U353, U359, Michigan codes 001D, 003D, 002U, 032U, 041U, 070U, 131U, 139U, 140U	Q8-6071
Group 7: Metals contaminated solids		
7.a. Lead contaminated solids	D008	
7.b. Mercury contaminated solids	D009	Q8-6015
Group 8: Non-RCRA regulated materials		
RCRA-empty containers	None	None
Non-RCRA regulated dirt	None	None
Non-RCRA regulated scrap solids (rags, pieces of metal and glass, asbestos & construction debris, column packing, used office furniture)	None	None
Containers of non regulated gloves	None	None
Cleaned process equipment	None	None

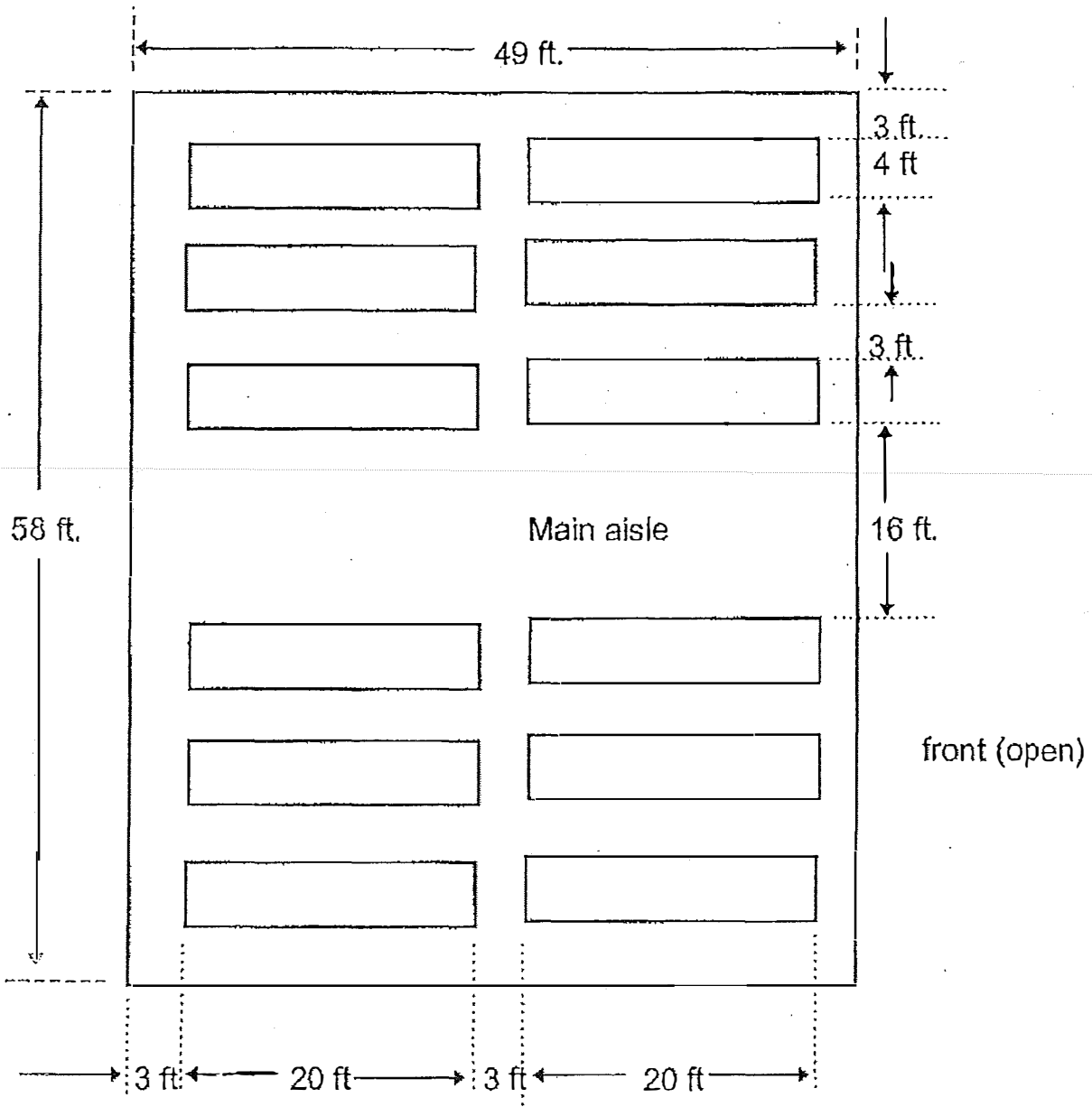
Module C1

Figures C1-1 & C1-2

The following Figures in this Module were revised:

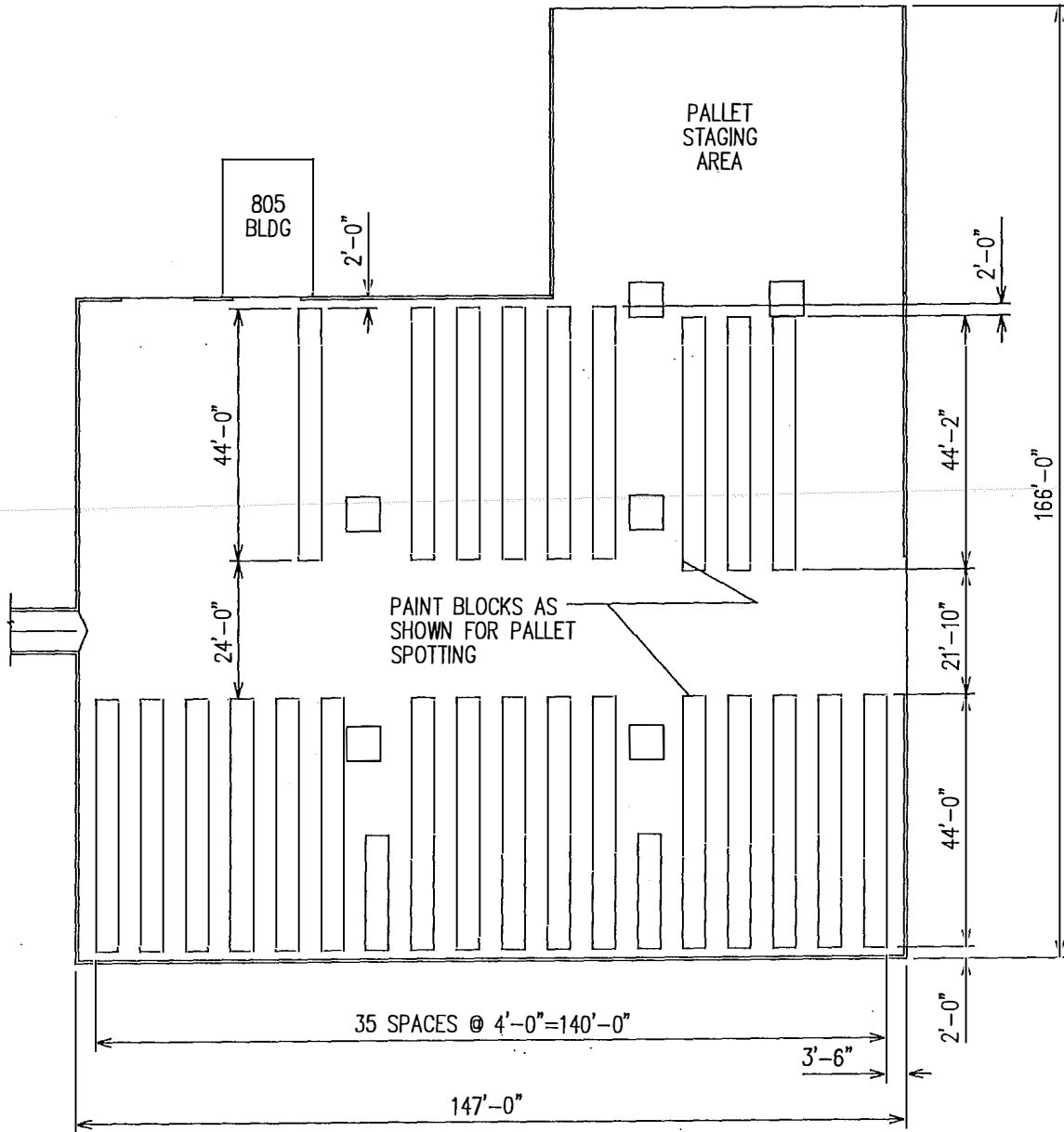
Container Storage Configuration in 801 Building

Container Storage Configuration in 809 Building



← North

DOW CORNING CORPORATION	
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CHECKED BY: MG	EDITED BY: NLW020210
FILE NAME: FgC1-1.Dwg	
FIGURE C1-1	
CONTAINER STORAGE CONFIGURATION IN 801 BUILDING	
DOW CORNING CORPORATION MIDLAND SITE 3901 SOUTH SAGINAW MIDLAND, MICHIGAN	
PROJECT NUMBER	SCALE: NTS



DOW CORNING CORPORATION	
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FILE NAME: FgC1-2.Dwg	
FIGURE C1-2 CONTAINER STORAGE CONFIGURATION IN 809 BUILDING	
DOW CORNING CORPORATION MIDLAND SITE 3901 SOUTH SAGINAW MIDLAND, MICHIGAN	
PROJECT NUMBER	SCALE: AS SHOWN

