

The Dow Chemical Company
Michigan Operations, Midland Site
Building 1790
Midland, Michigan 48667
Attn: Responsible Care Leader

Fugitive Dust Control Program

As required by Act 451 Section 324.5524, this Fugitive Dust Control Program for The Dow Chemical Company in Midland, Michigan is submitted for the Manufacturing Facility

Attachment #1 - The Site fugitive dust control plan map shows the area affected by this dust control plan.

Attachment #2 - Dust suppressants and application rates

No waste oil or recycled oil will be used for dust suppression.

- I. Manufacturing Facility
 - A. The Michigan Division Manufacturing Facility map shows the location of the following:
 - a. Roads and Parking Lots (Paved & Unpaved)
 - b. Current long term Storage Piles
 - c. Incinerator Complex Area
 - d. Staging Pile
 - B. Description of Practices
 - a. Paved Roads & Parking Lots
 - i. Cleaning of Roads and Parking Lots will only be done from April through October.
 - ii. Paved Roads will be inspected for visible dust by Dow Security personnel during their normal rounds. Excessive dusting will be reported and the identified area will be cleaned as soon as practical.
 - iii. All Paved roads (indicated on Map 1) will be cleaned a minimum of once per quarter during the months of April through September and once in October, if necessary. Paved roads will be cleaned when dusting can first be seen as vehicles travel on roadways. Cleaning consists of water flushing or wet sweeping.
 - iv. Paved parking lots will be cleaned when dusting can first be seen as vehicles travel across lots, and a minimum of once per year.
 - v. The posted speed limit will be no higher than 30 mph to minimize generation of dust.

- e. Incinerator Complex Area
(Covered under its own plan as referenced in TABLE E-1.56c
EG32INCINERATOR of the ROP)

- f. Staging Pile
 - i. Fugitive dust emissions will be minimized by covering the Staging Pile with a tarp when material is present, except when adding or removing inventory.
 - ii. Trucks hauling remediation waste soils will be tarped and have sealed tailgates.
 - iii. The trucks will enter the Staging Pile, deposit their load and then be decontaminated with brooms and shovels prior to exiting the facility.
 - iv. The Staging Pile and its components will be inspected as defined in the approved Part 111 Operating License.
 - v. Operations at the Staging Pile will follow any additional requirements set forth in an approved remediation project specific fugitive dust plan if applicable.

- g. Other Fugitive Dust Sources
 - i. Apparent dust generated by moving bulk materials by conveyor equipment will be controlled by enclosing all transfer points in the handling system.
 - ii. Dust generated by the chipping/mulching of pallets will be minimized through the use of a water spray.

- C. Records – Records of road cleaning, application of dust suppressant, and Staging Pile inspections will be retained for five years.

- D. *Maintenance/Updating of the Map – The map attached to this plan shall be updated semi-annually to reflect any changes in parking area, traffic patterns or storage piles. The updated map shall be submitted to the Air Quality Division District Supervisor and to the Chief of the Waste and Hazardous Materials Division by March 15th and September 15th of each year.*

Attachment #2

Dust Suppressants Used

1. Water
2. Solution: Water
Calcium Chloride (approximately 38%)
3. Solids Calcium Chloride Flake or
Pellet

Application Rate for Dust Suppressant - Gravity feed

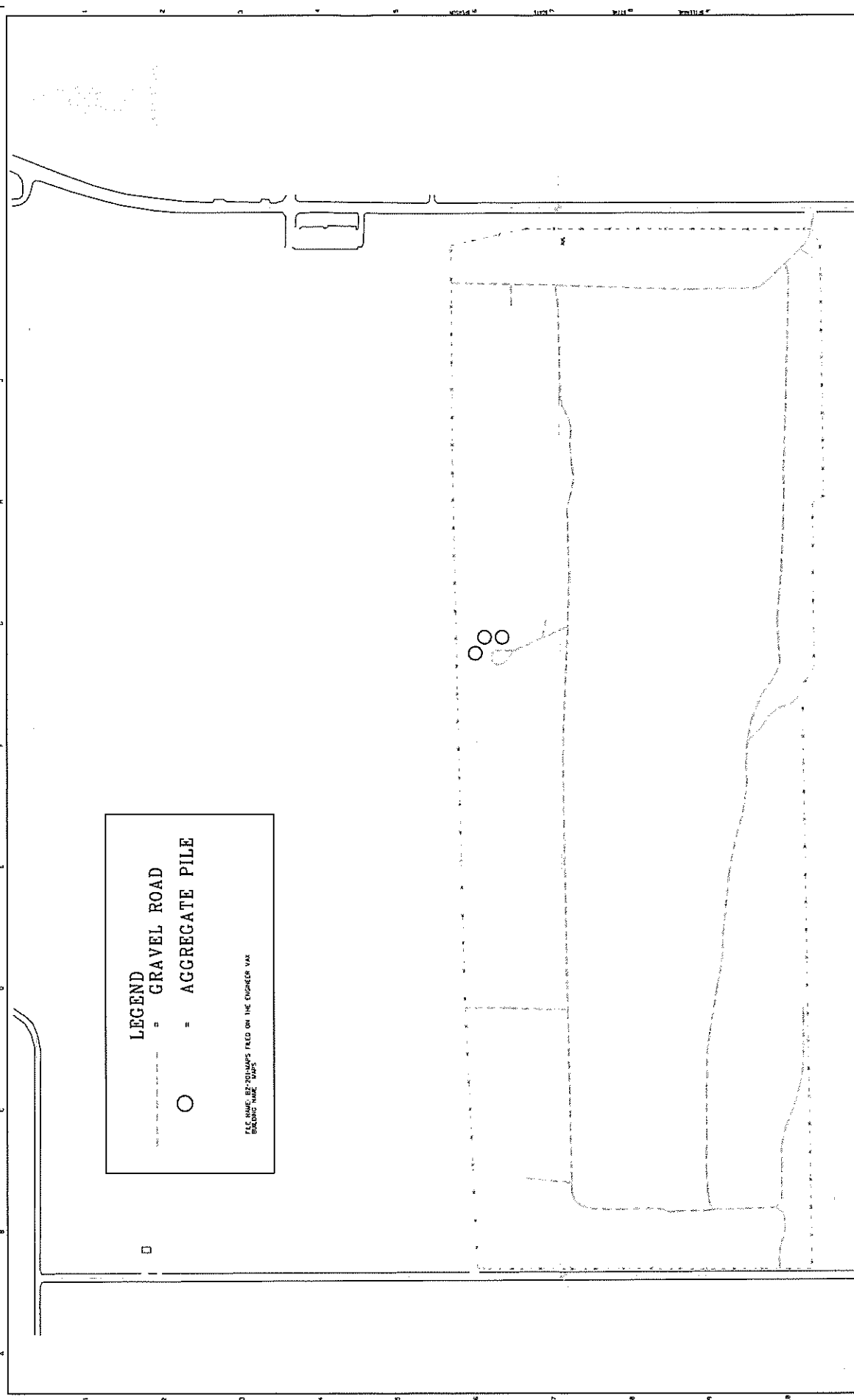
Dust suppressant will be applied at the rate of approximately 0.14 gallons/square yard.

Application Rate for Dust Suppressant (Spray/Flushing)

This method is generally used for paved surfaces and the dust on the surface is flushed/sprayed off the surface.

Application Rate for Dust Suppressant (Solids - Flake & Pellet)

1.0 lb per square yard for Flake
0.8 lb per square yard for Pellets



LEGEND

— = GRAVEL ROAD

○ = AGGREGATE PILE

FILE NAME, SEE DETAILS FIELD ON THE ENGINEER VAK
 BEARING NAME - WAKS

THE DOW CHEMICAL COMPANY MIDLAND DIVISION		PROJECT NO. 17258		SHEET NO. 2	
TO EXHAUST AIR UPGRADE POSEYVILLE LANDFILL FUGITIVE DUST MAP		DATE 12/28/88		DRAWN BY J. H. HOFFER	
FROM POSYVILLE LANDFILL FUGITIVE DUST MAP		SCALE AS SHOWN		CHECKED BY J. H. HOFFER	
REVISION NO. DATE BY DESCRIPTION		GRAPHIC ISSUE RECORD NO. DATE BY DESCRIPTION		DATE 12/28/88	
A MAP REVISIONS AND ISSUES HAVE BEEN REVIEWED AND APPROVED FOR CONSTRUCTION.		B MAP REVISIONS AND ISSUES HAVE BEEN REVIEWED AND APPROVED FOR CONSTRUCTION.		C MAP REVISIONS AND ISSUES HAVE BEEN REVIEWED AND APPROVED FOR CONSTRUCTION.	
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