

**Revisions to  
Interim Response Activity Plan  
Designed to Meet Criteria dated March 6, 2012**

Revision No.	Original Page	Original Section	Comment	Change Description
<b>Response to MDEQ Comments Dated April 19, 2012</b>				
<b>General Comments</b>				
1	--	--	Indoor Dust	An evaluation of exposure to indoor dust to determine whether a remedy is necessary to address dust accumulated in ducts for properties identified for soil remedy has been added to the Work Plan. The following sections of the Work Plan were updated with indoor dust discussion: - Section 7.4 - Response Actions to Address Residential Use - Section 7.4.7 - Completion of Presumptive Remedy - Section 7.4.7.1 - Construction Quality Assurance - Section 7.6.3 - Monitoring
2	--	--	Extensive Landscaping	A discussion was added to the Work Plan to address properties where the property owner provides information establishing that the existing lawn has been significantly landscaped or fill was placed across much of the property. The following sections of the Work Plan were updated with this discussion: - Section 7.4.3.1 - Sample Collection - Section 7.4.4 - Decision Rules - New Figure 7-7 - Decision Rules for Extensively Landscaped Properties
3	--	--	Evaluation of Non-Residential Land Use	Text was added to the Work Plan to present the approximate schedule for verifying that the land use on non-residential properties is consistent with the initial determination. The following sections of the Work Plan were updated with this discussion: - Section 7.5 - Response Actions to Address Non-Residential Land Use - Section 7.6.3 - Monitoring - New Figure 7-8 - Schedule for Review of Areas Designated as Non-Residential

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4	--	--	Northeast Midland Resolution Area Boundary	Discussion of two additional outliers located near the northeast boundary of the Midland Resolution Area was added to the Work Plan. This discussion includes consideration of confirming the northeast boundary of the Midland Resolution Area. The following sections of the Work Plan were updated with this discussion: - Section 4.2.3 - Outliers - Section 7.2 - Outliers (Response Actions) - Section 7.7 - Final Delineation of Midland Resolution Area Boundary - Section 9.3 - Midland Resolution Area Boundary
<b>Specific Comments</b>				
1	iv	Executive Summary	This should include a bullet that describes the process for properties that choose not to participate at this time (Trust Fund).	Added a bullet documenting that the work plan proposed the establishment of a trust fund for properties where owners do not wish to participate at this time.
2	iv	Executive Summary	Should include a bullet on documenting completion of the work with respect to Dow related contamination.	Revised bullet to document that the report provides a schedule of completing activities and all Midland Area Soils Corrective Action related to the historic airborne release from The Dow Chemical Company.
3	iv	Executive Summary	[Original comment made in Attachment A] This should be revised to indicate that the Work Plan contains a waiver request of the FS requirement.	Text revised to indicate that the Work Plan contains a waiver request of the FS requirements.
4	1	1.0 Introduction	General description of how this will be wrapped up into the final corrective measures for the Midland Area Soils.	Added text describing this IRDC and the overall completion of corrective action for the Midland Area Soils project.
5	2	1.2 License Procedure	General agreement; however, 'no further action' has specific definition that might not apply here.	Modified text to indicate 'no further remedial actions', it is understood that additional measures will be necessary to address all pathways.
6	2	1.2 License Procedure	[Original comment made in Attachment A] This should be revised to indicate that the Work Plan contains a waiver request of the FS requirement.	Text revised to present a waiver request of the FS requirements.
7	4	2.3.1 Process Emissions	May want to recognize more stringent environmental regulations.	Added text acknowledging more stringent environmental regulations as a contributor.
8	4	2.3.1 Process Emissions	Waste products were also sometimes burned for BTU value with the coal.	Added text describing that specific waste streams were burned in addition to coal in some historic power plants.

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9	8	2.3.3 Combustion of Solid Wastes	Need to add a sentence here that indicates that emissions are monitored on a routine basis by AQD. Also note the perimeter soil box monitoring program.	Added text indicating the incinerator testing frequency is required and notes the regulatory mechanisms. Added text with respect to fugitive dust control program and the soil box monitoring programs. Updates were also made to Sections 2.3.4 and Section 3.
10	11	3.0 Summary of Investigations and Studies	The EPA did not indicate that no risk was presented in 1984. This section is missing the study where EPA indicates the need for additional sampling and risk assessment related to dioxins and furans.	Added text discussing EPA 1988 'Risk Management Recommendations for Dioxin Contamination at Midland, MI Final Report', as well as a brief summary of how those recommendations were or are being satisfied.
11	12	3.0 Summary of Investigations and Studies	1998 Dow study needs fact checking. Some of the samples at the NE perimeter were at or near 1,000 ppt TEQ.	[No change necessary]. Statement has been verified. The statement refers to off-site results only. Sample NEP-S-11 was 1,070 ppt TEQ with a few additional results near 900 ppt; however these samples are within the facility boundary, perimeter fence, and have had clean fill placed over them in 2002. All corporate center samples were within the range specified in the existing text.
12	13	3.0 Summary of Investigations and Studies	The 2006 CH2M Hill Study section needs to be clarified that only a subset of the samples were collected for analysis in the 1-6" depths - the two rings of samples closest to the plant site.	Revised text to indicate that 30% of the samples were tested for SCOLs and dioxins/furans in the 1-6" depth. This corresponds to the two rings of samples closest to the plant site.
13	13	3.0 Summary of Investigations and Studies	Text describing "unblinding" is not accurate, needs clarification of what was specifically done.	Revised existing text to indicate that a centroid was established for the sampling area and that TEQ values were released to Dow and MDEQ for that sampling area for decision-making purposes, provided all properties were not owned by a single entity.
14	15	4.1.2 Climate and Meteorology	Include description of the newer NCDC and MAWN climate data used for site-specific criteria.	Text revised to incorporate more recent climate and meteorology information. Section 11 References updated with the following website for the Michigan State Climatologist's Office : <a href="http://climate.geo.msu.edu/Stations/5434/">http://climate.geo.msu.edu/Stations/5434/</a> .
15	17	4.1.4 Geomorphology and Geology	Permeability in glacial till is typically low also because of the high degree of compaction.	Sentence revised indicate that the high degree of compaction also impacts permeability of glacial till.
16	17	4.1.4 Geomorphology and Geology	Clarification is necessary to indicate that sandy regional aquifer is not present everywhere in study area - sometimes pinches out against bedrock valley walls.	Revised text to clarify that the R.A. underlies 'much' of the area, and is largely located within bedrock valleys.

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17	18	4.1.5 Hydrogeology	Glacial till sands are used for domestic water supply in some areas adjacent to Midland. Note groundwater is not used for drinking water in the Resolution Zone.	Added text to indicate that within Midland County till sands are a source of drinking water. Also noted that groundwater is not used for drinking water in the Midland Resolution Area.
18	19	4.2 Midland Land Use	[Other factors, such as development age may be considered as well] - paraphrased from verbal conversation.	Added text to indicate that the physical features of the area would also be considered.
19	20	4.2.2 Residential Land Use	[Possible generic description of Residential Land Use or Residential-Like Land use].	Added an additional sentence to clarify what constitutes a 'residential-like' property.
20	20	4.2.2 Residential Land Use	Day shelters need more consideration including known or likely soil concentrations (related to track in) and outdoor activities.	Text changed to clarify the facilities serve adults.
21	20-21	4.2.3 Outlier Area(s)	Need a description of how other outlier areas may be identified and addressed in the work plan.	Refer to response to General Comment on Northeast Midland Resolution Area Boundary.
22	21	4.2.3.1 Zoning	Will need to acquire definitions of the zoning categories for future use for the Institutional Controls.	Noted. No text change necessary.
23	22	4.2.3.1 Zoning	Need a record of the Midland zoning map and the zoning plan at this point in time so DEQ knows what was considered to make this decision.	The Midland zoning map and plan will be provided to DEQ as a CD attachment - new Attachment K.
24	22	4.3.1 Conceptual Site Model	Pathways are not incomplete. They were evaluated to determine that they do not exceed criteria and therefore do not require further evaluation.	Sentence revised to document that pathways were evaluated to determine if COC concentrations exceed pathway criteria and do not require further evaluation.
25	22	4.3.1 Conceptual Site Model	Other pathways and/or COCs will be addressed if necessary prior to completion of the IRDC.	Added sentence to note that if determined to be necessary based on on-going evaluations, other pathways and/or COCs will be addressed according to the proposed schedule presented in Section 10.2.
26	24	4.3.1.2 Fate and Transport Mechanisms	There is evidence of Toluene in soil - this should be a more general statement, such as 'typically'.	Inserted the word, 'typically'.
27	24	4.3.1.2 Fate and Transport Mechanisms	This section should indicate that dioxins and furans are considered very persistent.	Added sentence to note that dioxins and furans are persistent.
28	24	4.3.1.2 Fate and Transport Mechanisms	DEQ recognizes the potential for this surface transport pathway to have an effect on adjacent residential properties and will be addressed under this work plan.	To address this comment, additional text was added to the text revisions completed in Section 7.5 addressing the verification of non-residential land use.

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29	25	4.3.2 Exposure Pathways	Add a concluding paragraph to draw together - will be required to prepare a report that documents whether additional response activities are necessary to address other hazardous substances or pathways (if required Dow will submit a work plan including a schedule).	Added a conclusion paragraph that documents that evaluation is ongoing to determine if additional efforts are necessary to address other pathways and/or COCs. The findings of this evaluation will be completed and documented in accordance with the schedule presented in Section 10.2.
30	26	5.1 Purpose	Replace "separate" CA with "additional" CA. Other pathways and hazardous substances may be required.	Text revised to state 'an additional corrective action...'
31	28	5.2.3.2 Background	Call this a regional background and also make the adjustment to Table 5-1.	Text updated to replace "Modified Urban Background" with "regional background". Table 5-1 and Section 5.3.1 text also updated with this edit.
32	30	5.3.1 Screening Categories	Category D4 was evaluated spatially, include in the list. Compounds in group E2 are pending, so they 'May' be removed.	Added D4 to the list. Revised text to indicate compounds in this category 'may' be eliminated.
33	31	5.3.1 Screening Categories	Background concentrations were obtained from "State of Michigan background information for metals (when available)"	Revised text to indicate primary and supplemental sources for background data.
34	33	5.5.1 Determination of Depth of Dioxin and Furan Impacts	Incorrect reference to Figure x, should be Figure 5-5.	Figure reference was corrected.
35	36	6.0 Summary of the Basis for the Residential Site-Specific Action Level	[Add a reference to the use of the 2005 WHO TEFS] - paraphrased from verbal conversation	References were added to the 2005 WHO TEFS in Section 6. Additional references were added in the following locations: - Section 3.0 - Section 5.2.2 - Section 5.5
36	41	7.1 Midland Resolution Area	Recommend avoiding use of the terminology "full corrective action" in this context as there are other components of the corrective action process that will not be complete until the DEQ approves the Corrective Measures Implementation Report.	Sentence revised to replace "full corrective action" with "all field activities".
37	43	7.2 Outlier Area	Need to reflect the evaluation of other relevant information as well (ages of houses, etc.) The trigger for this is not just based on the "three property" buffer.	Revised the text to indicate that sampling will be completed when the available information shows that the areas are less than 250 ppt or they have been bounded. Physical features of each area will also be part of the decision.
38	43	7.3 Current Land Use	Need a way for property currently identified as non-residential to be reevaluated for residential-like. It may be appropriate to have some decision rules that allows both current and future evaluations (if land use change) to be consistent.	See General Comments for text revisions addressing this topic.

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39	44	7.4 Response Action Addressing Residential Land Use	Based on existing data, 6-12 inch depth contains a significant number of locations over 250 ppt. Eliminate "greater" from this sentence and reword "...to a depth below where SSAL exceedances area expected..."	Sentence reworded to state that presumptive remedy "removes soil to a depth where SSAL exceedances could occur...".
40	46	7.4.3.1 Sample Collection	Additional guidelines should be indicated for offsets from sample grid points.	Additional interferences noted, and a generic statement included for items not yet addressed.
41	52	7.4.7 Completion of the Presumptive Remedy	Add language to minimize diesel emissions, to the extent practicable.	Text added to Section 7.4.7 to indicate that when using heavy equipment during excavation and/or construction, diesel emissions will be minimized, to the extent practicable. Reference to Attachment L provided. Attachment L was added to provide information on Green Remediation Project Guidelines.
42	52	7.4.7 Completion of the Presumptive Remedy	Revise to indicate that clean up will occur, as necessary, under porches/decks etc that that are reasonably accessible to humans (i.e. raised decks).	Revised text to indicate that new cover and/or barriers could be used in those cases where the existing decks are elevated to a degree that would allow reasonable access for use beneath it.
43	53	7.4.7 Completion of the Presumptive Remedy	Should reference Health and Safety Plan.	Project Health and Safety Plan included for reference as Attachment J.
44	52	7.4.7 Completion of the Presumptive Remedy	--	Inserted reference to Project Soil Erosion and Sedimentation Control plan for reference as Attachment I.
45	54	7.4.7.1 Construction Quality Assurance	Add text to indicate the plan to revisit undisturbed limited use wooded areas during Adaptive Management.	Text added in Section 7.6.1 (Trust Fund) to address this comment and indicate that heavily wooded lots that have not been sampled or where remedy was declined or deferred and are zoned to allow residential-like use will be included in the Trust.
46	54	7.4.7.2 Post Remedy Care and Maintenance	Clarify that plants will be replaced, and will not have to be negotiated on a case-by-case basis.	Text clarified to indicate that plants will be replaced if they don't survive after the first growing season and that this will be spelled out in the site-specific remediation plan for their property.
47	55	7.5 Response Actions Addressing Non-Residential Land Use	Some non-Residential sampling may be done to better define the Midland Resolution Area Boundary.	Revised text to include possible sampling to better define Midland Resolution Area Boundary.
48	55	7.5 Response Actions Addressing Non-Residential Land Use	Site F1 - Should we do some incremental sampling to confirm this, as this site is not restricted like Site 1?	Added the results of the 95% UCL evaluation of the data for Site 1.
49	56	7.5.1 Decision Rules for Non-Residential Property	Consider referencing building codes in Section 7.4.1.	Reference to building codes added to text.

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50	57	7.6.1 Trust Fund	Clarify that residentially zoned woodlots will be included as appropriate.	Text clarified to indicate that residentially zoned woodlots will be included as appropriate.
51	57	7.6.2 institutional Controls	The IRDC is not final until all other components of project are completed.	Revised sentence to remove "final" and just state "The remedy is designed...."
52	58	7.6.2 institutional Controls	Existing zoning ordinance that prohibits residential use (e.g., industrial) will still need to be reviewed and likely revised for consideration as reliable exposure control.	Noted. No text change necessary.
53	58	7.6.3 Monitoring	Need to work out how and when all non-residential properties will be evaluated, including those outside residential areas included in scheduled work.	See General Comments for text revisions addressing this topic.
54	58	7.6.3 Monitoring	Does monitoring during the project include an evaluation for determining what is/is not residential or residential-like.	Added discussion of review of non-residential land-use in Section 7.5 and updated text in 7.6.3 to indicate that this monitoring would be completed in conjunction with that evaluation.
55	59	7.7 Final Delineation of Midland Resolution Area	Additional flexibility needs to be added to this section to account for other possible influential factors than just concentration.	Text revised to indicate that other factors will be included in the evaluation and stated the overall goal of the boundary, consistent with the evaluation.
56	61	8.1 Sampling Plans	Clarify language to specify that residential lots don't need to be larger than 7200 square feet.	Re-ordered sentence to clarify this.
57	61	8.1.4 Non-Residential DUs	Clarify that these properties will be monitored.	Revised text to indicate that the properties identified in this section will be subject to monitoring.
58	63	9.0 Adaptive Management	Clarification - A number of aspects of work that may be proposed for change subject to approval.	Text modified to indicate that the items listed that may be recommended for change and submitted to MDEQ for approval.
59	64	9.1 Rationale for Changes	Also need to evaluate 'wooded' vs. 'non-wooded' concentrations.	Noted. Text is currently not intended to identify every item that will be considered for evaluation. No text was modified in response to this comment.
60	65	9.3 Midland Resolution Area Boundary	Need a mechanism to evaluate boundary in those areas where sampling is not currently proposed to be conducted - especially where pre-existing discrete data shows concentrations could exceed 250 ppt TEQ.	Revised text to make boundary discussion consistent with revisions to Section 7.7 and included a discussion referencing Section 7.7 discussion of the northeast boundary.
61	66	10.1 Reporting	Need to identify minimum frequency of updating and have some periodic submittal of information to satisfy potential FOIA requests.	Text was modified to discuss that a project progress tracking log that is routinely updated will be made available to MDEQ on a continual basis during the project implementation and is provided in lieu of a monthly written progress report.

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<b>Attachment A</b>				
1	2	General Text	Add Footnote "2": This discussion is based on Dow's License issued June 12, 2003, and the relevant provisions of Part 201 and the Part 201 administrative rules in effect on that date (License Condition XI.G).	Footnote added as requested.
2	2	General Text	Monthly/quarterly download of information from Sharepoint?	Text was modified to discuss that a project progress tracking log that is routinely updated will be made available to MDEQ on a continual basis during the project implementation.
3	3	License Requirement: Submit IRA Report within 60 days after completion of IRA	Need to also reference the final completion report noted later in the table.	Text added to reference the final completion report.
4	3	License Requirement: Monthly Reports	Can monthly/quarterly or some other frequency "download" of the Sharepoint information be provided?	Text was modified to reference a project progress tracking log that is routinely updated will be made available to MDEQ on a continual basis during the project implementation.
5	6	License Requirement: Legal description of the specific parcel of property addressed by the response activity	Maps, addresses, and a list of the parcel numbers are adequate for the legal description of the individual properties addressed by the response activity. For properties where only a portion has been sampled and/or remediated, Dow can provide the map with GPS coordinates of the corners of the unsampled/unremediated area(s).	Text updated to document that for parcels where only a portion of the property is addressed, Dow will provide a map and GPS coordinates delineating the unsampled / unremediated areas.
6	6	License Requirement: If the interim response activity is a subset of a remedial action that is being planned, then provide a description of the relationship of the interim response to the remedial action	Describe how this fits in with the other hazardous substances and exposure pathways for the IRDC and the overall RAP or corrective measure implementation - the "paperwork" and the ongoing monitoring that will be necessary, groundwater leach tests, any necessary waivers, etc.	Text was added to document how the IRDC fits into the overall RAP and corrective measure implementation process for the Midland Area Soils project. Additional miscellaneous text changes were made to make the attachment text consistent based on this comment.
7	7	License Requirement: Submit a written RI Work Plan.	The Department has determined that the Midland Area Soils Work Plan will provided sufficient data for remedial decision making for MAS dioxins and furans. The revised RIWP will address other remaining pathways and hazardous substances, if any.	Text was added to document that the IRDC address dioxins and furans in soil for the direct contact pathway; and the revised RIWP will further evaluate COCs/exposure pathways not addressed in this work plan.
8	7	License Requirement: Develop and Implement a Feasibility Study (FS) to evaluate response activity alternatives (may be waived by MDEQ). License, XI.I	This should be revised to indicate that the Work Plan contains a waiver request of the FS requirement.	Text revised to indicate that the Work Plan contains a waiver request of the FS requirements. Executive Summary updated to indicate that Work Plan contains a waiver request and Section 1.2 presents the request.
<b>Attachment B</b>				
--	--	--	No comments.	No changes warranted.



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<b>Attachment C</b>				
--	--	--	No comments.	No changes warranted.
<b>Attachment D</b>				
1	All	Agreement Forms	Box indicating that educational materials provided. Do you intend to distribute educational materials at the meeting with property owner or should this be removed?	The educational materials have already been distributed at public meetings and the box on the form was removed.
<b>Attachment E</b>				
1	All	Example Letter Templates	Should MDEQ contact information be provided on these letters?	MDEQ contact information was added to each letter.
<b>Attachment F</b>				
--	--	--	No comments.	No changes warranted.
<b>Attachment G</b>				
--	--	--	No comments.	No changes warranted.
<b>Attachment H</b>				
1	--	General	Consider adjusting Decision Units to address potential alternative source and possible exposure to adjacent properties.	Modified sampling plan Decision Units to include a DU along the rail line and DUs for adjacent property to evaluate backfill along the tracks as a potential alternative source other than historical aerial deposition, as well as possible exposure for adjacent properties.
<b>Attachment I</b>				
1	--	--	per Revision 44, Specific Comments	Added Attachment I Project Soil Erosion and Sedimentation Control Plan.
<b>Attachment J</b>				
1	--	--	per Revision 43, Specific Comments	Added Attachment J Project Health and Safety Plan.
<b>Attachment K</b>				
1	--	--	per Revision 23, Specific Comments	Added Attachment K Electronic Copy of City of Midland Zoning Map.
<b>Attachment L</b>				
1	--	--	per Revision 41, Specific Comments	Added Attachment L Green Remediation Project Guidelines.
<b>Response to MDEQ Comments Dated May 18, 2012</b>				
<b>Specific Comments</b>				
1	16	4.1.2 Climate and Meteorology	There needs to be a reference to the frozen soil/soil temperature work that was done by Michigan State in 2010.	Reference added.
2	21	4.2.2 Residential Land Use	Add "e.g." to parentheses and remove "less than 6 yrs old".	Completed text revision as requested.

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3	21	4.2.2 Residential Land Use	For property uses where it is not clear if it is "residential" or "residential-like" use, the work plan should state that the exposure at the property will be compared to the residential and non-residential exposure assumptions under Part 201 to determine how they should be managed under the IRDC.	Added a sentence that reads: "When considering a property to determine if the use is residential-like, the actual land use will be evaluated against the residential and non-residential exposure assumptions of Part 201."
4	44	7.2 Outlier Areas	It appears that the reference to Section 7.3.2.1 should be to Section 7.4.4 - please verify.	Verified and change made.
5	45	7.2 Outlier Areas	Add "age of property development" concept into the evaluation process.	Completed text revision as requested.
6	46	7.4 Response Action Addressing Residential Land Use	It appears that the reference to Section 7.4.6 should be to Section 7.4.7.1 - Please verify.	Verified and change made.
7	49	7.4.3.1 Sample Collection	Possible addition of a bullet point to address short term Midland property access issue - although it appears to be covered under the last bullet.	Added the following bullet: "Increment locations will be offset from area where access has not been granted."
8	49	7.4.3.1 Sample Collection	Replace the reference to "whole property" with "a large portion" or similar.	Revised text to replace reference to "whole property" with "much of the property."
9	53	7.4.4 Decision Rules for Residential Land Use	Replace the reference to "whole property" with "a large portion" or similar.	Revised text to replace reference to "whole property" with "much of the property."
10	53	7.4.4 Decision Rules for Residential Land Use	Suggest addition of sentence "If concentrations at the DU exceed the SSAL, further evaluation will be conducted as specified in Section 7.4.7.1" or similar.	Added the following sentence: "If the detected concentration at the DU is greater than the SSAL, further evaluation exposure to dust accumulated in the dwelling(s) duct work will be performed as per Section 7.4.7.1."
11	56	7.4.7 Completion of Presumptive Remedy	Remove phrase "(e.g., adjoin an upper level of the home)" or reword to capture the concept that an exposure barrier will be placed to reduce contact with existing soils under structures that are/could be accessed routinely.	Text revised to remove phrase "(e.g., adjoin an upper level of the home)".
12	59	7.4.7.1 Construction Quality Assurance	With respect to the concentration of dioxins and furans in the unsampled wooded areas where the presumption will be that the unsampled wooded area concentrations are the same as the sampled area concentrations, the DEQ wants to capture the concept that this assumption may be revisited under the adaptive management process as additional wooded area data is collected and evaluated. Recommend that this be done by addition of a new bullet in Section 9 "Management and monitoring of undisturbed limited use wooded areas," or similar.	Added bullet to Section 9 that reads "Monitoring and management of undisturbed limited use woodland properties."

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13	61	7.5.1 Decision Rules for Non-Residential Property	It appears that the reference to Section 7.4.1 should be to 7.4.3.1 - please verify.	Verified and change made.
14	69	9.0 Adaptive Management	See comment #12.	Added bullet to Section 9 that reads "Monitoring and management of undisturbed limited use woodland properties."
15	71	9.3 Midland Resolution Area Boundary	Add "and physical features" into the phrase ("taking age of property development and physical features into account)." Check for use of consistent language in other portions of the work plan (e.g., Comment 5 above).	Text revised as requested and other references to this statement have been made consistent throughout the document.
<b>Attachment A</b>				
1	1	Title	The Table of Contents lists "Attachments." The document is titled "Appendix A". Please revise as appropriate.	Title corrected to "Attachment A".
2	6	Item (b)	As discussed, the lists of properties will also need to include parcel and/or property numbers as well as the current address.	Edited text now reads: "Maps of the areas subject to the response action are included in Figures in the Work Plan. Further, lists, by address and parcel number, of properties that have been addressed in a given year will be provided in each annual summary report. for parcels where only a portion of the property is addressed, Dow will provide a map with parcel number and GPS coordinates delineating the unsampled / unremediated areas."
<b>Attachment C</b>				
1	19	4.4.7 Split Sampling Procedures	The QAPP specifies a specific procedure for MDEQ split sampling. This will need to be revised. Discussion of this topic is scheduled for our call on Tuesday, May 22, 2012.	As per this comment and the discussion during the call on May 22, 2012, the text was revised to read as follows: "Michigan Department of Environmental Quality (DEQ) staff will periodically split some samples as part of their oversight of this project. Data generated from DEQ split samples will be used to monitor the overall quality of project analytical work. The laboratories used during this project will use different analytical methods, and some differences are anticipated. A comparability study between Dow analyzed samples and agency analyzed samples is being conducted prior to the start of this project."

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<b>Attachment H</b>				
1	7	Scope of Work	As discussed, please revise this language to indicate that "If any of the four DUs exceed 990 ppt TEQ, Dow will submit a plan for further evaluation of the offsite area for DEQ review and approval within 30 days of that determination," or similar - rather than the process currently identified in the work plan.	The text was revised to read as follows: "If results of sampling on any of the four (4) DUs listed above indicate the soils exceed 990 ppt TEQ, Dow will submit a plan for further evaluation of the offsite area to MDEQ for review and approval within 30 days of determination."
<b>Attachment I</b>				
1	All	Soil Erosion and Sedimentation Control Plan	Discussion of this topic is scheduled for our call Tuesday, May 22, 2012, after Dow has had an opportunity to review WRD's proposed revisions.	The SE/SC was revised in response to the WRD's comments as discussed during the May 22, 2012 call.
<b>Attachment J</b>				
1	--	Job Safety Analyses	As discussed, please include "Ask and be aware of children," in each of the work activities identified in the MAS Job Safety Analysis	The JSAs were revised as requested.