



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR - 6 2016

REPLY TO THE ATTENTION OF:

Sally Kniffen
Environmental Specialist
Saginaw Chippewa Indian Tribe of Michigan
7070 E. Broadway
Mt. Pleasant, MI 48858

Michael McClellan
Field Operations Section Chief, East
Remediation and Redevelopment Division
Department of Environmental Quality
525 West Allegan Street
Lansing, MI 48909

Kory Groestch
Manager Toxicology and Response Section
Michigan Department of Health and Human Services
201 Townsend Street
Lansing, MI 48913

RE: *Dow Chemical Company/Schlumberger Ltd., Mount Pleasant, Michigan Site*

Dear: Ms. Kniffen, Mr. McClellan, and Mr. Groestch,

The U.S. Environmental Protection Agency, Region 5 would like to thank you for the opportunity to meet with you on March 17, 2016 for an update on recently discovered dioxin/furan contamination at the site owned by the Dow Chemical Company and Schlumberger Limited located in Mount Pleasant, Michigan. EPA found the meeting very helpful in understanding the investigation and remediation activities that have taken place, and planned investigation and remediation activities for the coming field season. In addition, the site visit following the meeting was very helpful in gaining a better understanding of conditions at the site. EPA would like to share some concerns based on information presented during the meeting and conditions observed during the site visit.

During the meeting, the Saginaw Chippewa Indian Tribe (Tribe) raised the issue of freshwater mussels not being included in fish tissue sampling and analysis. EPA believes that this is a valid human health exposure pathway that should be evaluated. In addition, EPA recommends that the

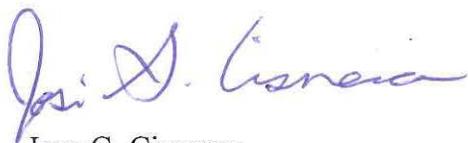
Michigan Department of Environmental Quality (MDEQ) and the Michigan Department of Health and Human Services (MDHHS) consult with the Saginaw Chippewa Indian Tribe (Tribe) to identify any additional human health exposure pathways that need to be evaluated (e.g. turtles, edible plants, etc.) for potential risk to Tribal members. In addition, EPA recommends that future sampling and analysis of fish should include the normally evaluated constituents (e.g. PCBs and mercury) along with dioxins/furans and arsenic to better characterize risks.

During the site visit, EPA observed fragments of approximately one inch diameter black rods scattered in several areas around the site. MDEQ and Dow staff identified these rods as pieces of graphitic electrodes. Sampling results have shown that these rods can have dioxin/furan levels around 100,000 ppt TEQ. EPA has concern that site work could further fragment and spread the rod fragments making the furans more available on the surface and more likely to be transported offsite by run-off and wind. Further, EPA is concerned that recent site work may have spread contamination in a manner that would change surface sampling results at the site if the sampling was conducted today.

EPA recommends that a rod management plan be developed to ensure future activities do not fragment and spread the rods further throughout the site. The management plan should include delineating the extent of rods at the site (surface and subsurface) and provide measures to prevent their spread with future site work.

EPA looks forward to working with MDEQ, MDHHS, and the Tribe on this important site.

Sincerely,



Jose G. Cisneros
Chief
Remediation and Reuse Branch