



November 20, 2003  
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The Dow Chemical Company  
Midland, Michigan 48667

Mr. Allen B. Taylor, Senior Geologist  
State of Michigan Department of Environmental Quality  
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Dear Al,

The intent of this letter is to respond to a request from the Michigan Department of Environmental Quality (MDEQ) with an explanation of how a grant provided to Michigan State University (MSU), and the work plan submitted by MSU to the MDEQ on August 7, 2003, relate to Dow's hazardous waste operating license requirements.

Dow has provided an unrestricted and unspecified grant to MSU to conduct ecological studies in the Tittabawassee River area. In a meeting with the MDEQ on September 12, 2003, it was explained by Dow and MSU that the studies that MSU are conducting under the Dow grant are considered basic research preliminary to the development of an ecologic risk assessment work plan by Dow. It is understood by Dow that because this work by MSU is not part of the ecological risk assessment to satisfy Dow's corrective action obligations under the Part 111 operating license, MDEQ approval of MSU's work plan submitted August 7, 2003 is not required.

The future work plan that will be developed by Dow to conduct ecological risk assessment activities will require MDEQ review and approval. Dow intends to use all available information to design an extensive ecological risk assessment of the Tittabawassee River area to evaluate possible exposure pathways and potential risk to the ecosystem, in meeting its license requirements. Some of the information generated by MSU, under the grant provided by Dow, would be expected to be included in the development of a work plan to conduct the ecological risk assessment. As this work plan, including any use of data MSU may develop requires MDEQ review and approval, MDEQ input on MSU's research activities is valued.

*waste & Hazardous*  
**Materials Division**

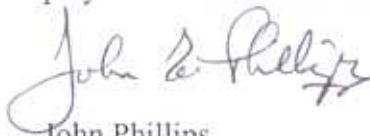
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Because MSU is a publicly supported institution, all of the information they collect will be made public without prior Dow approval. The information obtained by MSU will be provided to Dow, the MDEQ, United States Environmental Protection Agency, United States Fish and Wildlife Service and any other interested persons simultaneously. The results may be presented at national and international meetings and published in the peer-reviewed literature.

Dow has sought assistance from several other organizations and institutions. One such organization is ENTRIX, Inc., which has been retained by Dow to conduct work relative to the Remedial Investigation (RI) as well as to assist in designing other studies outlined in the Scope of Work (SOW). ENTRIX will advise Dow on issues of environmental fates and effects of environmental residues, conduct studies, and may develop an ecological risk assessment utilizing all available and appropriate data and information. In addition, ENTRIX will provide expertise to Dow to assess other information and documents developed by Dow, its contractors or other institutions or agencies.

It is yet to be determined the roles these as well as other organizations or institutions will play in the collection and analysis of ecological samples, and interpretation of results.



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cc: David Gustafson, Dow Chemical  
Cheryl Howe