



DOW CHEMICAL U.S.A.

June 30, 1982

MIDLAND MICHIGAN 48640

RE: DOW USA WASTE DISPOSAL POLICY

It is the policy of Dow Chemical USA that recycling or reuse of materials be given first consideration prior to classification and disposal as waste. If recycling is not acceptable or justifiable, then incineration should be the primary disposal method. Land disposal may be considered as an alternative only after:

- 1) it has been determined that recycling and incineration cannot be justified,
- 2) land disposal will be accomplished in strict accordance with State and Federal laws regulating such disposal,
- and 3) approval of the Division General Manager has been received.

Internal disposal of Dow waste is a goal of Dow Chemical USA. Disposal on a site not owned by Dow may be considered if the following conditions are met: 1) the disposal method is an environmentally sound practice, 2) the non-Dow site is State or Federally approved, 3) the appropriate Dow Division Environmental Manager has approved both the method and the site in accordance with Dow standards, and 4) approval of the Division General Manager has been received.

Non-hazardous waste such as trash and garbage may be disposed of in sanitary landfills in accordance with State and Federal laws.

Inactive land disposal sites, where Dow wastes have been disposed, will be evaluated utilizing Dow's guidelines for evaluating such sites. Each Division Environmental Manager has a copy of these guidelines.

The property on which an inactive Dow-owned disposal site is located will not be sold or ownership transferred without prior approval of the Director of Operations, Dow Chemical USA.

Questions regarding this policy statement should be addressed to the appropriate Division Environmental Manager or to the U.S. Area Environmental Quality Department.


Hunter W. Henry
President
Dow Chemical U.S.A.