



REGION 6

DALLAS, TX 75270

July 19, 2026

Sent via email

Mr. Michael G. Snyder
The Dow Chemical Company
Post Office Box 150, Bldg. 3502-E
Plaquemine, Louisiana 70765-0150
michaelsnyder@dow.com

RE: The Dow Chemical Company, Tokio and James Formations, Proposed Petition Reissuance
Decision for DWD No. 1

Dear Mr. Snyder:

Based on a detailed technical review of the submitted 2019 petition reissuance including supporting documents, I am proposing to approve your petition reissuance. This petition reissuance is seeking an exemption to the land disposal restrictions of the Hazardous and Solid Waste Amendments of 1984, to the Resource Conservation and Recovery Act. Enclosed are the public notice and the fact sheet documents associated with this proposed decision. This proposed approval of a petition for reissuance of an exemption to allow the injection of restricted hazardous wastes is subject to the listed conditions for DWD No. 1 attached below. A final decision regarding the Dow Chemical Company and Albermarle West Plant, Tokio and James Injection Interval proposed petition reissuance will be made after the end of the public comment period.

We appreciate your cooperation during the detailed petition review process. If you have any questions or comments regarding this matter, please contact Forrest Frederick at Frederick.Forrest@epa.gov or (214) 665-6656.

Sincerely,

Troy C. Hill, P.E.
Director
Water Division

Attachment: [Proposed Petition Reissuance Approval Conditions]

ATTACHMENT

DWD No. 1 - Proposed Petition Reissuance Approval Conditions

This proposed approval of a petition for reissuance of an exemption to allow the injection of restricted hazardous wastes is subject to the following conditions, which are necessary to assure that the standard in 40 C.F.R. Section 148.20(a) is met. Noncompliance with any of these conditions is grounds for termination of the exemption, *see* 40 C.F.R. Section 148.24(a)(1). This proposed exemption applies to the Dow Chemical Company injection well: DWD No. 1, located at its Albemarle Corporation West Plant in Magnolia, Arkansas.

1. Injection of restricted waste shall be limited to the following injection zone:

Well	Depth of Injection Zone (Feet)
DWD No. 1	2180 – 4510 ¹

(¹DWD No.1 depths referenced to 4/11/2006 High Resolution Induction Spectral Density Dual Spaced Neutron Log using Kelly Bushing (KB) depths in feet).

The injection intervals shall be defined by the following correlative log depths:

Well	Injection Interval	Depth of Injection Interval (Feet)
DWD No.1	Tokio Sandstone	2890 – 3080 ¹
	James Limestone	4340 – 4510 ¹

(¹DWD No.1 Injection Interval depths are referenced to 4/11/2006 High Resolution Induction Spectral Density Dual Spaced Neutron Log using Kelly Bushing (KB) depths in feet).

2. For DWD No. 1, the cumulative monthly volume injected into each of the injection intervals shall not exceed that calculated as follows:

James Limestone: (100, gpm)(1440 minutes/day)(number of days in that month)

Tokio Sandstone: (100, gpm)(1440 minutes/day)(number of days in that month)

3. The facility shall cease injection into DWD No. 1 by January 1, 2029, at which time, this petition reissuance will expire.

Following the expiration of this petition reissuance, this petition may be administratively continued upon receipt of a complete no migration petition reissuance application. The petition will stay under administrative continuance while the EPA reviews the application until the EPA makes a final decision on reissuance of the no migration petition. While in administrative continuance, the petition conditions remain fully in effect and enforceable during the reissuance review process.

4. The characteristics of the injected waste stream for DWD No. 1 shall at all times, conform to those discussed in Section 6 of the 2019 Petition Reissuance document for DWD No. 1. The specific gravity of the waste stream injected into each interval shall remain within the running volume-weighted three-whole calendar month range of 1.00 to 1.05 at 72°F (22.2°C).

The running three-whole calendar month average shall be calculated on a combined well basis by multiplying each day's specific gravity/density value by that day's injected volume, totaling those values for the previous whole three-month period, and dividing by that three whole-month injected volume. For the above calculation, each day's specific gravity value shall be obtained by at least one representative grab sample from the common waste stream distribution line to the well.

5. The approval for injection is limited to the following hazardous waste codes:
D002, D003, D028, U066, and U067

The above waste codes are based on the [Health Based Limits Table](#).

6. The facility must petition for approval to inject additional hazardous wastes not included in Condition No. 5, above. The facility must also petition for approval to increase the concentration of any waste which would necessitate the recalculation of the limiting concentration reduction factor and the extent of the waste plume. Petition reissuances and modifications should be made in accordance with 40 C.F.R. Section 148.20(e) or (f).

7. Dow Chemical Company, Albemarle Corporation West Plant shall annually submit to the EPA the results of a bottom hole pressure survey for DWD No. 1. These surveys shall be performed after shutting in each well for a period of time sufficient to allow the pressure in the injection interval to reach equilibrium, as per 40 C.F.R. Section 146.68(e)(1). The annual report should include a comparison of reservoir parameters determined from the falloff test with parameters used in the approved no migration petition. The information should consist of a comparison of the current year's test results for the static and flowing bottomhole pressures with the values demonstrated in the approved petition reissuance and a comparison of the test results for transmissibility [Kh/μ (mD-ft/cP)] with the transmissibilities used in the approved petition reissuance demonstration for both the pressure buildup and the 10,000-year plume modeling.

8. Dow Chemical Company, Albemarle Corporation West Plant shall also annually submit to the EPA a radioactive tracer survey, annulus pressure test, and waste sample analysis for DWD No. 1 according to 40 C.F.R. Section 148.20(a)(2)(iv). Additionally, Dow must submit an approved temperature and/or noise log at least once every five years in accordance with 40 C.F.R. Section 146.68(d)(3). The Director may also require casing inspection logs be run by Dow in the event that DWD No. 1 undergoes well workover in which the injection string is pulled as per 40 C.F.R. Section 146.68(d)(4). As per 40 C.F.R. Section 146.68(d)(5) any other test approved by the Director in accordance with the procedures in 40 C.F.R. Section 146.8(d) may also be used.

9. Dow Chemical Company, Albemarle Corporation West Plant shall notify the EPA if DWD No. 1 loses mechanical integrity prior to any well work on DWD No. 1 or if Dow plans to plug DWD No. 1. If any well work or plugging is being planned, Dow Chemical Company, Albemarle Corporation West Plant shall also submit the procedures to the EPA for review before commencing any work. As per 40 C.F.R. Section 146.67(h)(3) the owner/operator of the well(s) shall Notify the Director, electronically, within 24 hours after loss of mechanical integrity is discovered. Failure of the owner/operator to notify the EPA within 24 hours of loss of mechanical integrity could result in a potential violation from the EPA Enforcement and Compliance Assurance Division.

10. Upon the expiration, cancellation, reissuance, or modification of the Arkansas Department of Energy and Environment (ADEE) Underground Injection Control permits for DWD No. 1, this exemption is subject to review. A new demonstration may be required if information shows that the basis for granting the exemption is no longer valid under 40 C.F.R. Sections 148.23 and 148.24.

11. Dow Chemical Company will notify EPA of a change in ownership of the operator for the well. Notification must include a written agreement containing a specific date for transfer of petition responsibility, coverage, and liability between the current and new petition holder as per 40 C.F.R. § 144.41(d).

In addition to the above conditions, this proposed approval of a petition for reissuance of an exemption is contingent on the validity of the information submitted in the Dow Chemical Company petition reissuance request for an exemption to the land disposal restrictions. Any final reissuance decision is subject to termination when any of the conditions occur which are listed in 40 C.F.R. Section 148.24, including noncompliance, misrepresentation of relevant facts, or a determination that new information shows that the basis for approval is no longer valid.