



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 25, 2019

Ms. Karen Mann, EH&S Responsible Care Leader
Dow Silicones Corporation
1790 Building, Washington Street
Midland, Michigan 48674

SRN: A4043, Midland County

Dear Ms. Mann:

VIOLATION NOTICE

On March 26, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Dow Silicones Corporation located at 3901 South Saginaw Road, Midland, Michigan. The purpose of this inspection was to determine Dow Silicones Corporation's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A4043-2019.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU304-02 Alkylsilane Process	MI-ROP-A4043-2019, SC III.1, General Condition 30	Exceedances of process/operational restriction of coolant inlet temperature, -13°C.
EU304-02 Alkylsilane Process	MI-ROP-A4043-2019, SC III.4	Proper operation of condenser 414 requires maintaining the operational restriction in SC III.1.
EU304-02 Alkylsilane Process	MI-ROP-A4043-2019, SC VII.2 and VII.3	Exceedances of the coolant inlet temperature on condenser 414 were not reported in the Semiannual and Annual deviation reports for 2018.

EU304-02 Alkylsilane Process	MI-ROP-A4043-2019, SC VII.4	Exceedances of the coolant inlet temperature on condenser 414 were not reported in the 2018 CAM excursion reports.
EU304-02 Alkylsilane Process	MI-ROP-A4043-2019, SC III.3, General Condition 30	Process operates although the 337 wet scrubber is not utilized as control.

As part of the March 26, 2019 inspection of EU304-02, coolant inlet temperatures of condenser 414 were requested for the time period of March 1, 2018 through March 22, 2019. Pursuant to special condition III.1 of EU304-02, coolant inlet temperatures of condenser 414 shall not exceed -13°C. Special condition IV.1a. of FGSITEBLOWER allows the emission vents at EU304-02, that are part of FGSITEBLOWER, the ability to operate the additional air pollution control equipment with parameters at levels or ranges outside of the specified parametric ranges or levels in their individual ROP tables, while EUTHROX is operating properly. However, coolant inlet temperatures of condenser 414 operated at higher temperatures than permitted, while emissions were not vented to EUTHROX or EUTHROX was not operating properly, as defined.

During the inspection, AQD staff received a permit exemption demonstration to operate condenser 414 as a separate emission unit (EU304-01) and to be exempt from permitting pursuant to R 336.1290. R 336.1278(4) states, exemptions in R 336.1280 to R 336.1291 apply to the requirement to obtain a permit to install only and do not exempt any source from complying with any other applicable requirement or existing permit limitation. Operational restrictions, or permit limitations, exist within the current renewable operating permit for condenser 414.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 16, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the EGLE, AQD, Bay City District, at 401 Ketchum Street, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Dow Silicones Corporation believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Dow Silicones Corporation. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Gina L. McCann
Senior Environmental Quality Analyst
Air Quality Division
989-439-2282

cc: Ms. Jennifer Kraut, DOW
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Chris Hare, DEQ