

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A404352879

FACILITY: Dow Silicones Corporation		SRN / ID: A4043
LOCATION: 3901 S Saginaw Rd, MIDLAND		DISTRICT: Saginaw Bay
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT: Jennifer Kraut , Air Specialist		ACTIVITY DATE: 02/26/2020
STAFF: Gina McCann	COMPLIANCE STATUS:	SOURCE CLASS: MEGASITE
SUBJECT: EU800-01		
RESOLVED COMPLAINTS:		

DOW Silicones/EGLE-AQD staff present during the inspection:

- Gina McCann (EGLE-AQD, Senior Environmental Quality Analyst)
 - Jennifer Kraut (Air Specialist, DOW Silicones)
 - Jim Nemeth (DOW MiOPS)
 - Elizabeth Petschar (DOW MiOPS)
 - Zach Johnson (DOW MiOPS)

Records reviewed as part of the inspection were:

- ROP Annual report for 2018

EU800-01

This emission unit consists of the 800 block tank farm consisting of storage and transfer operations for on-site waste liquids. Four (4) 10,000 gallon tanks for mixed solvents and two (2) 10,000 gallon tanks dedicated to a methoxy stream and code B. The most recent PTI for this emission unit is PTI No. 334-88C.

Waste is collected from various operations on-site and then trucked to tanks that ship them off site for disposal.

Special Conditions (SC) I.7 and I.9 limit VOCs and Non-VOC emissions to less than 0.67 ton per year (tpy) and 0.04 tpy, respectively. Liquids are either pumped into the tanks or pumped out of the tanks. This activity is done under a vapor balance closed loop system. No emissions are lost. For the 12-month rolling time period ending December 2019 VOC emissions were 0.0 tpy and Non-VOC emissions were 0.0 tpy.

SC III.1. requires the plant to properly operate the N2 pressure blanket, which means that it will have a pressure differential of not less than 5 psig between the N2 inlet and tank exhaust regulator pressures. There was inclement weather during the inspection and due to safety concerns of climbing stairs/ladders with ice on them the pressures were not observed. The plant maintains the pressure regulator is on top of each tank and is checked periodically to ensure compliance is maintained.

SC VI.1.a. requires the plant to monitor and record, on a per shift basis, the N2 pressure blanket differential (i.e., difference between the N2 inlet and tank exhaust regulator pressures). A records request for the month of February was sent on March 10, 2020, post inspection. Ms. Kraut responded on March 19, 2020, "DSC does not maintain the record required by condition no. VI.1 in table EU800-01 of the ROP. However, DSC does perform a daily RCRA inspection to ensure the tanks are operating properly, including the N2 pressure blanket. A deviation, including corrective action, will be reported in the next semi-annual Title V report for this condition." The plant appears to be meeting this requirement through RCRA, however the logs are not kept quite the same as required. A violation notice will not be sent. The plant has recognized the two requirements do not quite align and have made the appropriate adjustments.

SC VI.2. requires the plant to record the date, amount of liquid waste transferred, and the type of transfer (e.g. dempster, tank truck, drum, vacuum transfer, etc.) for each transfer of liquid waste to and from each storage tank and for each dempster depressurization. These records were reviewed on-site and the plant appeared to be meeting the requirement.

Compliance Reporting

No deviations were reported during this time period.

NAME 

DATE 3/19/2020

SUPERVISOR Chris Hare