

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

A404353280

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: 03/25/2020
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: FGHP2012A2A		
RESOLVED COMPLAINTS:		

Inspection Date: 3/25/2020

This inspection was a records review.

- Gina McCann (EGLE-AQD, Senior Environmental Quality Analyst)
- Jennifer Kraut (Air Specialist, DOW Silicones)

FGHAP20212A2A

This flexible group consists of all the listed emission units below. The listed emission units are the emission units at the facility as of the effective date of Permit to Install No. 91-07C (November 19, 2012) that emit hazardous air pollutants and emission units that support HAP emitting emission units, such as boilers and the InEnTec plasma enhanced melter (EU2515-01). This flexible group will apply to all the listed emission units even if they are reconstructed as defined in the Michigan Rules (R 336.1118), modified, renamed, or re-permitted. This flexible group was established for the purposes of keeping records for the actual to projected actual PSD applicability determination. The most recent PTI for this emission unit is PTI No. 91-07E.

Emission Units: EU106-01, EU106-02, EU106-05, EU106-06, EU106-07, EU106-12, EU108-01, EU108-02, EU109-01, EU109-02, EU109-04, EU109-05, EU109-06, EU109-07, EU109-09, EU207-01, EU207-02, EU207 04, EU212-01, EU212-02, EU212-03, EU212-04, EU212-05, EU212-06, EU212-07, EU212-08, EU212 10, EU212-11, EU212-12, EU2404-01, EU2409-01, EU2409 02, EU2515-01, EU2701-01, EU2703 01, EU2703-02, EU2703-03, EU2703 04, EU2703-05, EU2703-06, EU2703 07, EU2703-08, EU2703-09, EU2703 10, EU2703-12, EU2703-13, EU2703 14, EU2901-02, EU2901-04, EU2901-05, EU2901-14, EU2901 15, EU2901-16, EU303-01, EU303-02, EU303-03, EU303-04, EU303-06, EU303-09, EU303-10, EU303-11, EU303-13, EU303-15, EU303-16, EU303-17, EU303-18, EU304-01, EU3101-01, EU3102 02, EU3102-05, EU3102-09, EU3104 06, EU3104-08, EU3104-09, EU3104 14, EU311-01, EU321-01, EU321-02, EU321-05, EU321-07, EU321-08, EU321-10, EU321-11, EU321-13, EU321-14, EU321-16, EU321-17, EU322 01, EU322-02, EU322-03, EU322-05, EU322-09, EU322-10, EU322-11, EU324-01, EU324-02, EU324 03, EU324-05, EU324-06, EU325-04, EU340-01, EU340-03, EU501-01, EU501-02, EU501-03, EU501 11, EU501-12, EU501-13, EU501-15, EU501-17, EU501-24, EU501-32, EU501-34, EU501-40, EU501 49, EU502-01, EU505-01, EU505-04, EU505-05, EU508-01, EU508-03, EU515-01, EU601-01, EU602 01, EU604-10, EUSITE-05, EUSITE-08, FG322-01, FGBOILERS2701-01, FGSITESCRRUBBERS, FGTHROX

Special condition (SC) VI.1. requires the facility to calculate and keep records of the annual emissions of VOC and NOx from FGHAP2012A2A described in Appendix 7, Section 7.14, in tons per calendar year. Calculations and record keeping shall begin upon issuance of Permit to Install No. 91-07C (November 19, 2012) and shall continue for ten (10) years.

In addition to semiannual and annual reporting of deviations pursuant to General Condition 23 of Part A, the facility is required to submit records of the annual emissions of VOC and NOx from FGHAP2012A2A described in Appendix 7, in tons per calendar year, to the AQD Permit Section Supervisor within 60 days following the end of each reporting year if both the following occur:

- a. The calendar year actual emissions of VOC and NOx exceed the baseline actual emissions (BAE) listed in Appendix 7 by a significant amount, as defined in R 336.2801(qq)(i)(B) and (E), and
- b. The calendar year actual emissions differ from the pre-construction projections listed in Appendix 7, Section 7.14.

The report shall contain the name, address, and telephone number of the facility (major stationary source); the annual emissions as calculated pursuant to SC VI.1, and any other information the owner or operator wishes to include (i.e., an explanation why emissions differ from the pre-construction projections).

Annual emissions of VOC and NOx from FGHAP2012A2A from November 19, 2012 through February 29, 2020 were requested. NOx and VOC emissions records from January 1, 2020 through February 29, 2020 were not provided as the requirement is to calculate emissions annually to demonstrate compliance, not on a 12-month rolling. VOC emissions for EUSITE-05 and EUSITE-08 were not included in the overall total for the 2018 and 2019 calendar year emissions as emissions from these emission units was not recorded. This was reported as a deviation in the latest Title V deviation report submitted on March 13th and corrective action has been implemented (i.e., emissions are being recorded for calendar year 2020 for these emission units). From 2012 through 2020, the average VOC emissions from EUSITE-05 and 08 was approximately two tons per year and have been added into the table below.

Based on the average VOC emission rate and the NOx emission rate the table, below, demonstrates that PSD does not apply. The facility is in compliance with the conditions of the ROP.

Pollutant	Baseline Actual	Actual Emissions 2012	Actual Emissions 2013	Actual Emissions 2014	Actual Emissions 2015	Actual Emissions 2016	Actual Emissions 2017	Actual Emissions 2018	Actual Emissions 2019
VOC	147	117	112	114	106	102	90	88	79
NOx	50	54	48	42	46	38	26	25	21

Compliance Reporting

No deviations were reported for the time period January 1, 2018 through December 31, 2018.

NAME 

DATE 4/10/2020

SUPERVISOR 