



STATE OF MICHIGAN  
 DEPARTMENT OF  
 ENVIRONMENT, GREAT LAKES, AND ENERGY  
 LANSING



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

May 24, 2019

Mr. Reiner Roghmann  
 Michigan Operations Site Leader  
 1790 Building, Washington Street  
 Midland, Michigan 48674

SRN: A4043, Midland County

Dear Mr. Roghmann:

**VIOLATION NOTICE**

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed the Continuous Emission Monitoring System (CEMS) Certification Test Report submitted by Dow Silicones Corporation located in Midland, Michigan. The Renewable Operating Permit number MI-ROP-A4043-2019 requires the facility to monitor and record Nitrogen Oxides (NO<sub>x</sub>) emissions from EUBOILER13 and EUBOILER14 on a continuous basis in a manner and with instrumentation acceptable to the AQD. This unit is also subject to Title 40 of the Code of Federal Regulations (CFR), Part 60, Standards of Performance for New Stationary Sources, Subpart Db.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER13, EUBOILER14	MI-ROP-A4043-2019 FG432BOILERS, VI, 2	The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the NO <sub>x</sub> emissions for each of the three boilers included in FG432BOILERS on a continuous basis and according to the procedures outlined in Appendix 3 attached and 40 CFR, 60.48b(b)(1), (c), (d), (e), (f)

Appendix 3 of MI-ROP-A4043-2019 requires that within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating that the NO<sub>x</sub> CEMS complies with the requirements of Performance

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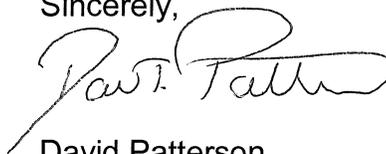
Specification 2. Performance Specification 2, Section 13.3 requires that the relative accuracy of the CEMS must be no greater than 20 percent when using the reference method monitors during the Relative Accuracy Test Audit (RATA). The RATAs were conducted on March 19-20, 2019. The test report was received May 20, 2019. The reported relative accuracy of EUBOILER 13 was 46 percent. The reported relative accuracy of EUBOILER14 was 32 percent. The failure of the RATAs has resulted in the NO<sub>x</sub> monitors for EUBOILER13 and EUBOILER14 being out of control from the date of the failure until new RATAs are conducted and the monitors pass Performance Specification 2.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 14, 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.

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. 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,



David Patterson  
Environmental Quality Analyst  
Air Quality Division  
517-284-6782

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Chris Hare, EGLE  
Ms. Gina McCann, EGLE