



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

LANSING



LIESL EICHLER CLARK
 DIRECTOR

GRETCHEN WHITMER
 GOVERNOR

August 19, 2019

UPS NEXT DAY DELIVERY

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 Reports 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_x) emissions from EUBOILER13 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	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 _x 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).

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 or 10

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percent of the applicable standard, the permit limit of 0.041 lb/MMBtu. A relative accuracy test audit (RATA) was conducted on Boiler 13 on March 19, 2019 and again on May 29, 2019. The reported relative accuracy of EUBOILER 13 was 46 percent in March. The reported relative accuracy in May was 38 percent of the reference method and 20 percent of the applicable standard. Due to the RATA failures, the NO_x monitor for EUBOILER13 has been out of control since March 19, 2019 and will remain out of control until a new RATA is conducted and the monitor passes Performance Specification 2.

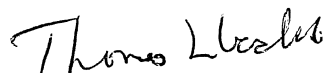
Boiler 13 operated for 769 hours during the second quarter. The monitor was out of compliance for the entire quarter resulting in 100 percent downtime during boiler operation in that quarter.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 9, 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,



Thomas Gasloli
Environmental Quality Analyst
Air Quality Division
517-284-6778

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