



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 21, 2019

Ms. Karen Mann
EH&S Responsible Care Leader
The Dow Chemical Company
1790 Building, Washington Street
Midland, Michigan 48674

SRN: A4043, Midland County

Dear Ms. Mann:

VIOLATION NOTICE

On July 23, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Dow Silicones Corporation located at 3901 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
EU502-07	<p>IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u></p> <p>1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the mass flow rate of the vapor from the Bulk Move Vents to the Site Scrubber System on a continuous basis. For the purposes of this condition, "on a continuous basis" is defined as an instantaneous data point recorded at least once every 15 minutes.¹ (R 336.1225)</p>	Flow transmitter had not been calibrated since installing the equipment in 2011.

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During this inspection, Dow Silicones Corporation was unable to produce calibration records for the flow transmitter that monitors and records the mass flow rate of the vapor from the Bulk Move Vents to the Site Scrubber System. This is a violation of the design/equipment parameters requirements specified in Special Condition EU502-07, Special Condition IV.1. of ROP number MI-ROP-A4043-2019.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 11, 2019. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

Please submit the written response to 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 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 violation cited above and for the cooperation that was extended to me during my inspection of DOW Silicones. If you have any questions regarding the violation 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. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE