



GRETCHEN WHITMER
GOVERNOR

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

EGLE
LIESL EICHLER CLARK
DIRECTOR

November 9, 2020

Ms. Kristan Soto, Michigan Operations Site Responsible Care Leader
The Dow Chemical Company
1790 Building, Washington Street
Midland, Michigan 48640

SRN: A4043, Midland County

Dear Ms. Soto:

VIOLATION NOTICE

On September 16, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the semi-annual deviation report from Dow Silicones Corporation located at 3901 South Saginaw Road, Midland, Michigan for Renewable Operating Permit MI-ROP-A4043-2019.

During review of the deviation report, staff observed the following deviations of Renewable Operating Permit (ROP) number MI-ROP-A4043-2019 for EU207-03:

Process Description	Rule/Permit Condition Violated	Comments
EU207-03	SC 1.2	The facility exceeded the 12-month rolling total for VOC by 3.84 tons per year for several months during the 2020 calendar year.
EU207-03	Rule 201	Emissions of hexamethyldisiloxane (EBB) exceeded the quantity disclosed in the application for the current permit.

The deviation report identified emission exceedances of the 2.9 ton per year VOC limit, which is based on a 12-month rolling time period, 3.84 tons per year.

The report also identified a violation of Rule 201 of the administrative rules promulgated under Act 451. Emission calculations were updated on all products in EU207-03, generating a new emission rate which exceeded the amount that had been previously disclosed in the permitting process.

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A program for compliance may include a completed PTI application for EU207-03 process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 14, 2020 (which includes the extension requested). 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.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, 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. 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. Jennifer Kraut, Dow
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE