



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 14, 2021

UPS NEXT DAY DELIVERY

Ms. Kristan Soto
EH&S Responsible Care Leader
Dow Silicones Corporation
1790 Building, Washington Street
Midland, Michigan 48674

SRN: A4043; Midland County

Dear Ms. Soto:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has reviewed the quarterly excess emission report submitted on November 2, 2021 by Dow Silicones Corporation located at 3901 South Saginaw Road in Midland. Permit No. MI-ROP-A4043-2019 and Title 40 of the Code of Federal Regulations (40 CFR), Part 60, Subpart Db, require the facility to monitor and record nitrogen oxides (NO_x) emissions from EUBOILER14 (FG432BOILERS) on a continuous basis in a manner and with instrumentation acceptable to the AQD.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
FG432BOILERS EUBOILER14	MI-ROP-A4043-2019, FG432BOILERS, SC VI.2, SC VI.3, SC VI.5	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). ² (R336.1205(1), 40 CFR 52.21(j), 40 CFR 60.48b).

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Process Description	Rule/Permit Condition Violated	Comments
FG432BOILERS EUBOILER14	MI-ROP-A4043-2019, FG432BOILERS, SC VI.2, SC VI.3, SC VI.5	Failure to continuously monitor nitrogen oxides.

The 2021 third quarter excess emission reports indicate excess periods of NO_x monitor downtime for EUBOILER14 of 52.8 percent.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 4, 2022 (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,



Lindsey Wells
Environmental Quality Analyst
Air Quality Division
517-282-2345

cc: Ms. Becky Meyerholt, Dow Silicones Corporation
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Chris Hare, EGLE
Ms. Gina McCann, EGLE
Ms. Jenine Camilleri, EGLE