



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

November 3, 2016

Mr. James McGee
Dow AgroSciences, LLC
350 North Huron Avenue
Harbor Beach, Michigan 48441

SRN: B4942, Huron County

Dear Mr. McGee:

VIOLATION NOTICE

Based on emission factors from stack tests performed on May 25th, 26th, 31st and June 1st and 2nd, 2016, Dow AgroSciences, LLC, located at 350 North Huron Avenue, Harbor Beach, Michigan, is not in compliance with special condition FG-TURBINES, I.2 of Renewable Operating Permit number MI-ROP-B4942-2015.

On October 28, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received emissions records, as requested by email. The purpose of the request was to assist in a review of test results from stack tests

Special condition FG-TURBINES, I.2, limits the emissions of NO_x_TEG & Turbine Running Modes to 3.8 lb/hr based upon a calendar day averaging period. Emission factors used for the calculations shall be based on the most recent testing data for each turbine in FG-TURBINES. Using the most recent test emission factors identified several NO_x emission exceedances since the date of the test.

During the record review, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|--|---|--|
| FG-TURBINES, TEG & Turbine Running Modes | NO _x _TEG & Turbine Running Modes, special condition I.2. in MI-ROP-B4942-2015 | Based upon a calendar day averaging period, the following days exceeded the NO _x limit of 3.8 lb/hr: 6/21/2016 (4.0 lbs/hr) 9/1/2016 (4.0 lbs/hr) 10/6/2016 (3.9 lbs/hr) 10/19/2016 (4.0 lbs/hr) 10/20/2016 (5.6 lbs/hr) |

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 28, 2016 (which coincides with 21 calendar days from the date of this letter, including holidays). The written response

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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 AgroSciences, LLC 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,



Gina L. McCann
Senior Environmental Quality Analyst
Air Quality Division
989-894-6218

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Hare, DEQ