

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

B878245161

FACILITY: The Dow Chemical Company		SRN / ID: B8782
LOCATION: 190 URAN ST, HILLSDALE		DISTRICT: Jackson
CITY: HILLSDALE		COUNTY: HILLSDALE
CONTACT: Ron Ryan , EH&S Delivery Tech		ACTIVITY DATE: 07/11/2018
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Ron Ryan, EH&S Delivery Tech
Email: RERyan@dow.com
Phone: 517-439-4413

Purpose

This was an unannounced targeted inspection of Dow Automotive Systems. This facility is a true-minor facility for emissions. They have one active permit to install (PTI) number 1015-92, which for a transfer station vent. I arrived at the facility and met with Ron Ryan, EH&S Delivery Tech, and explained the purpose of my visit.

Background

This facility was formerly known as Essex Specialty Products and was built in 1974. During the time it was Essex Specialty Products, they produced epoxies, automotive primers and sealants, and adhesives. Around 2000, Dow Automotive acquired this facility. Most of processes were either decommissioned or transferred to other facilities. They currently are a packaging facility and have started a new auto body adhesive production line.

Compliance Evaluation

PTI #1015-92 is for a transfer station vent and it is in Building 186 (see photo 1). Building 186 is for packaging adhesives that they from the Dow plant in Midland in 55-gallon drums. The drums are then loaded into a machine which will then take product and inject it into tubes, seal the tube up, and then box up the tubes so they are ready to be shipped. He then took me to the room where the process that is under PTI 1015-92 is located. We had to leave our cell phones outside the room as they were not intrinsically safe. The operation, which packages primer into containers of varying size, was not in operation at the time of inspection. He showed me the vent that was permitted and it looked like it met the dimensions specified in SC #18 (discharged upwards at least 26 feet and 11 inches diameter) When I drove by earlier, I did not see any visible emissions coming from the process (Special Condition #16).

We then went to Building 195 where he showed me their new auto body adhesive production line, which he said was exempt per Rule 290. They mix powders and liquid components to make an adhesive that is used on auto bodies in place of welding. He said this cuts down on the weight of the vehicle and is just as strong as the welds. They have two baghouses controlling the emissions from the mixing stations. They monitor the pressure drop on the baghouses to determine when the bags need to be changed and when the container for the captured material needs to be changed. They also have large electric ovens that they use to warm viscous material prior to batch addition.

Building 190 has been demolished. However, there is a possibility that a new building may be built on that site in the future to house a new a process, but nothing is currently in the works for this.

We then went back to the conference room and Ron produced the records that they were required to keep (S.C. #17). They VOC emission rate for the year was well below the limit of 3.29 tons/yr. As an example of how low their emissions are, they had emitted 0.0070 tons (14 lbs) and 0.0069 tons (13.8 lbs) of VOC in May and June, respectively. Since they only run one shift per day five days a week, I also determined that they were well below their limit of 0.75 lbs/hr (S.C. #15). He then showed me his spreadsheet that he received from Dow to track the emissions from the new process. He fills it out monthly and I was able to determine that they are meeting the requirements of Rule 290 (see attached).

Compliance Evaluation

Based on my observations during this inspection, I determined that they are complying with their permit. I thanked him for his time and left.

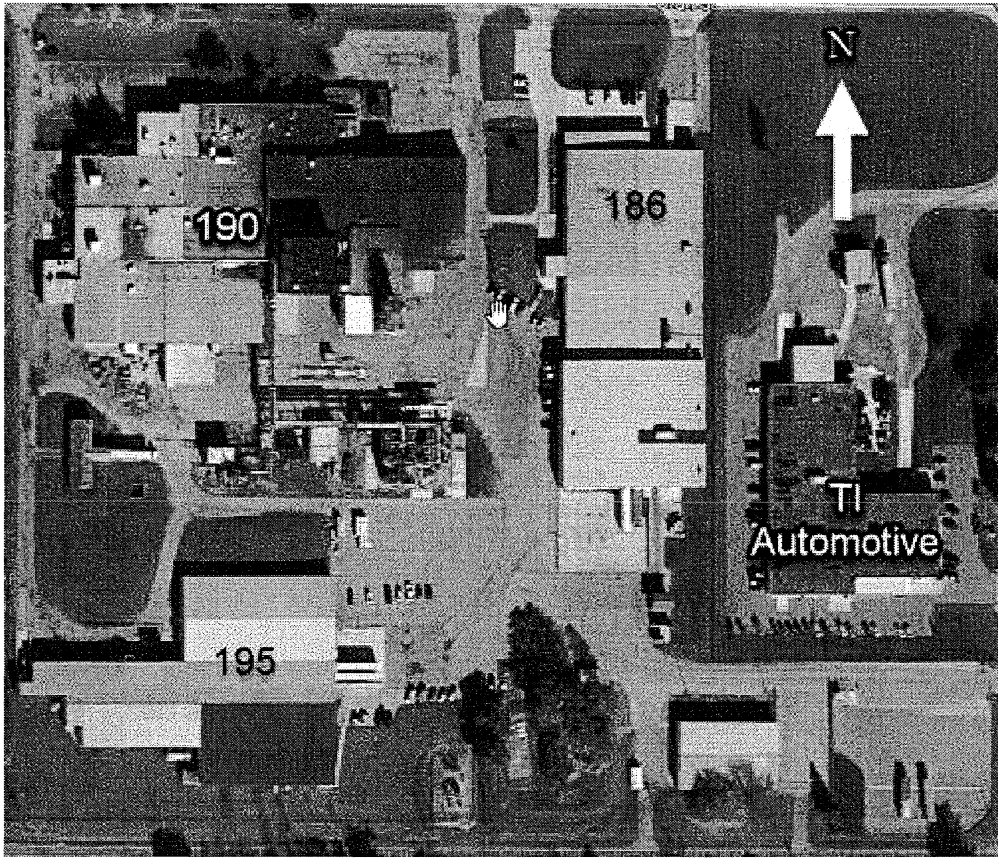


Image 1(Aerial photo) : Overhead view of Dow Automotive, Hillsdale, MI

NAME Brian Cady

DATE 8/9/18

SUPERVISOR [Signature]