

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

A403372183

FACILITY: The Dow Chemical Company U.S.A., Midland		SRN / ID: A4033
LOCATION: 1790 Building, MIDLAND		DISTRICT: Bay City
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT: Jim Alger , Midland Area State Air Permitting Specialist		ACTIVITY DATE: 05/21/2024
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: Partial compliance evaluation of EU1870-01.		
RESOLVED COMPLAINTS:		

A partial compliance evaluation (PCE) consisting of an onsite inspection and records review was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Dow Chemical (DC) site located in Midland, MI. Applicable records were requested on May 14, 2024, to verify compliance with Renewable Operating Permit (ROP) No. MI-ROP-A4033-2024, specifically for emission unit (EU)1870-01. Through this emission unit, select records were requested and reviewed for flexible group (FG)RULE290. It should be noted that EU633RICE and EU123RICE were also reviewed as a separate PCE during the course of this inspection. An in-person inspection to verify onsite compliance was later completed on May 21, 2024.

### **Facility Description**

DC is a chemical processing facility. The facility is a mega-site and is a major source of hazardous air pollutants (HAPs), nitrous oxides (NOx), particulate matter (PM) and volatile organic compounds (VOCs). Additionally, the site is subject to various federal regulations.

### **Offsite Compliance Review**

DC is required to submit semi-annual and annual compliance reports per Part A General Conditions of 19-23 of MI-ROP-A4033-2024. Previous reports were reviewed for select time periods. Based on the records reviewed, none of the deviations reported appeared to be associated with EU1870-01.

Based on the timing of the inspection, DC had submitted their State and Local Emissions Inventory System (SLEIS) Report for 2023 and was already processed. DC utilizes an EPA approved emissions calculation system to determine their emissions. Upon initial review, the supporting documentation attached was not acceptable. After additional discussions between AQD and DC staff, a representative example was provided to demonstrate how the program calculates emissions. After further review, the example appears acceptable. Based on timing, select emission unit records will be compared to reported emissions. Any significant discrepancies will be discussed further with company staff.

### **Compliance Evaluation**

A request was sent to Mr. Jim Alger, Midland Area State Air Permitting Specialist, on May 14, 2024, for records required by ROP No. MI-ROP-A4033-2024, specifically for EU1870-01 and FGRULE290. The onsite inspection was completed on May 21, 2024. AQD staff AS arrived at the offsite meeting location at 8:31am. Weather conditions at the time were mid 60's degrees Fahrenheit, mostly cloudy skies, and winds to the east at 5-10mph. Upon arrival AS met with Mr. Alger and several other company staff to initially go over records offsite and later completed a tour of the site, which included EU1870-01. Site specific questions were answered by company staff at the time of the inspection.

As mentioned above DC is a chemical processing facility. During the inspection, various components pertaining to EU1870-01 were reviewed and discussed at length with company staff.

**ROP No. MI-ROP-A4033-2024**

**EU1870-01 (RGRULE290)**

This emission unit is for the 1870 Building vapor intrusion system. This emission unit is believed to be exempt per Rule 290 by DC. Emission records were requested and reviewed for select time periods. It was determined that emissions for this emission unit are based on soil analytical data, and this stays consistent each month. The total emissions for each month for each toxic air contaminant are 2.142978005 lbs. After further review EU1870-01 appears to be exempt per Rule 290.

This emission unit was observed during the course of the site inspection and was operating at the time. Based on observations made at the time of the inspection, the EU appeared to be being operating in a satisfactory manner.

**Conclusion**

Based on the observations made and records reviewed, DSC appears to be in compliance with MI-ROP-A4033-2024, specifically the portions related to EU1870-01.

NAME Adam J. Sullivan

DATE 06/25/24

SUPERVISOR Maria L. McCann