



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



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

October 16, 2019

Ms. Karen Mann, EH&S Responsible Care Leader
 The Dow Chemical Company
 1790 Building, Washington Street
 Midland, Michigan 48674

SRN: A4043, Midland County

Dear Ms. Mann:

VIOLATION NOTICE

On September 26, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Dow Silicones Corporation located at 3901 South Saginaw Road, Midland, Michigan. The purpose of this inspection was to determine Dow Silicones Corporation's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A4043-2019.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG304VENTRECOVERY	MI-ROP-A4043-2019, FG304VENTRECOVERY, SC I.2	Plant cannot show compliance with 22.5 tpy VOC emission limit based on a 12-month rolling time period as determined at the end of the calendar month.

As part of the September 26, 2019 inspection of FG304VENTRECOVERY, emissions records were requested to determine compliance with the 12-month rolling, VOC emission limit, listed in special condition I.2. Pursuant to special condition I.2 of FG304VENTRECOVERY, VOC emissions are restricted to 22.5 ton per year, based on a 12-month rolling time period as determined at the end of each calendar month. The plant last tested FG304VENTRECOVERY in 2013. At that time, the VOC emission rate was 14.52 pounds per hour. During, recent conversations with Dow Silicones Corporation staff, it appears FG304VENTRECOVERY operates continuously. Therefore, VOC emissions exceed the permitted 22.5 ton per year limit.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 6, 2019 (which coincides with 21

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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.

Please submit the written response to EGLE, AQD, Saginaw Bay District, at 401 Ketchum Street, 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 violations cited above and for the cooperation that was extended to me during my inspection of Dow Silicones Corporation. 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
989-439-2282

cc: Ms. Jennifer Kraut, Dow
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Chris Hare, EGLE