



GRETCHEN WHITMER
GOVERNOR

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

EGLE
LIESL EICHLER CLARK
DIRECTOR

December 6, 2021

Ms. Kristan Soto, Michigan Operations Site Responsible Care Leader
The Dow Chemical Company
1790 Building, Washington Street
Midland, Michigan 48640
SRN: A4043, Midland County

Dear Ms. Soto:

VIOLATION NOTICE

On December 2, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Dow Silicones Corporation (DSC) located at 3901 South Saginaw Road, Midland, Michigan. The purpose of this inspection was to determine DSC'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; the conditions of Permit to Install (PTI) number 334-88D; 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
EU800-01	SC III.1. Shall not operate EU800-01 unless the pressure differential of the N2 pressure blanket is at least 5 psig	Tanks 19783, 19782, 19781, 19786, and 19785 were below 5 psi when viewed on-site.
EU800-01	SC VI.2. Monitor and record, on a per shift basis, the pressure differential of the N2 pressure blanket	DSC is not recording these values.

During this inspection, DSC was unable to produce monitoring records. This is a violation of (the recordkeeping and emission limitations) specified in Special Condition VI.2 of PTI number 334-88D.

The conditions of PTI number 334-88D require the plant to monitor and record, on a per shift basis, the pressure differential of the N2 pressure blanket (i.e., difference between the N2 inlet and tank exhaust regulator pressures) and make them available to the Department upon request.

Ms. Kristan Soto
The Dow Chemical Company
Page 2
December 6, 2021

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 27, 2021. 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, Bay City District, at 401 Ketchum Street, Suite B, 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 DSC 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 DSC. 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,

A handwritten signature in black ink, appearing to read "Gina L. McCann", with a large, stylized loop at the end.

Gina L. McCann
Senior Environmental Quality Analyst
Air Quality Division
989-439-2282

cc: Ms. Amanda Karapas, DSC
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE