



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

March 17, 2016

Mr. Alfredo Kowalski, Site Leader
Dow AgroSciences - Harbor Beach Facility
305 North Huron Avenue
Harbor Beach, MI 48441

SRN: B4942, Huron County

Dear Mr. Kowalski:

VIOLATION NOTICE

On March 11, 2016, the Department of Environmental Quality (DEQ) received the Semi-Annual Renewable Operating Permit Deviation Report from the Dow AgroSciences facility located in Harbor Beach, Michigan. The report covered the reporting period of January 1, 2015 through December 31, 2015. The following emission exceedances were included in the report.

Process Description	Rule/Permit Condition Violated	Comments
Natural gas fired turbines and duct burners with heat recovery steam generators	FG-Utilities I.1 13.6 lbs/hr NOx emission limit	Feb 13, 15, 16, & 19, 2015 SoLoNOx offline due to low ambient temperatures

Per Dow AgroSciences Deviation report, in sub-zero temperatures SoLoNOx technology is impacted by higher density air and shuts off. Estimated emissions and testing performed in late February 2015 indicate NOx emissions were exceeded for four days.

After review of operating options, Dow AgroSciences submitted a PTI application to the Air Quality Division (AQD) that was received September 4, 2015 for increased NOx emissions when SoLoNOx shuts down in sub zero conditions. Subsequent to the PTI application, AQD requested additional information and performed modeling on multiple operating scenarios. After review of emission impacts based on several modeling evaluations it was determined that the increase in requested emissions could not be met without physical and operational changes. On December 17, 2015, Dow AgroSciences requested that the PTI application be withdrawn and committed to develop a plan for NOx compliance acceptable to the AQD.

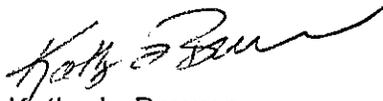
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 11, 2016. The written response should include: the dates the violations occurred; an explanation of the causes and duration of

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.

If Dow AgroSciences 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,



Kathy L. Brewer
Environmental Quality Analyst
Air Quality Division
(989) 894-6215
brewerk@michigan.gov

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Mark Mitchel, DEQ
Mr. Chris Hare, DEQ
Mr. Jim McGee, Dow AgroSciences