

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**EGLE-Liveson: 7018 3090 0000 8472 3187**

**EGLE-Camilleri: 7018 3090 0000 8472 3224**

**AND VIA E-MAIL**

RECEIVED

DEC 20 2022

Air Quality Division  
Detroit Office

December 16, 2022

Sam Liveson - Senior Environmental Engineer  
Michigan Department of Environment, Great Lakes & Energy - Air Quality Division  
Detroit District  
3058 West Grand Boulevard  
Cadillac Place – Suite 2-300  
Detroit, MI 48202-6058

Jenine Camilleri – Enforcement Unit Supervisor  
Michigan Department of Environment, Great Lakes & Energy - Air Quality Division  
P.O. Box 30260  
Lansing, MI 48909-7760

**Re: BASF Wyandotte Response to Violation Notice - B4359 VN 20221128**

Dear Mr. Liveson:

BASF Corporation (“BASF”) is submitting this response to the Violation Notice issued by the Air Quality Division (“AQD”) to BASF’s Wyandotte, Michigan plant (the “facility” or the “site”) on November 28, 2022.

1. The Violation Notice alleges that the Polyol Plant (EUPOLTKFARM) violated MI-ROP-B4359-2003b, Section 2, Table C-2.3, Special Condition II.B.1.1 and II.B.1.2, as well as Rule 702(a) by exceeding hourly and annual TDI emission limits.

AQD asserts that TDI emissions exceeded the emission limit of 0.0031 pounds per hour in up to 109 unloading instances from January 1, 2017, through May 1, 2022. AQD also asserts that TDI emissions exceeded the emission limit of 0.18 pounds per year within each calendar year from 2017 through 2022.

BASF has the following responses to this allegation:

During the unloading of toluene diisocyanate (TDI) from a rail car to a storage tank, it was observed that PSV-2507 lifted. Nitrogen is used to unload TDI and flush the line to tank TK-536. It appears the unload line valve (XV2513) did not close quickly enough to prevent a lift of the PSV. The reaction time of the valve solenoid was not quick enough to prevent

nitrogen flow, causing high pressure in the TDI tank. Also, the nitrogen regulator was not operating correctly.

Corrective actions were conducted within 30 days and included the following:

- replacing the valve solenoid to allow the valve to close quicker
- changing the regulator on the nitrogen line to ensure nitrogen is being properly regulated
- adding an additional interlock to XV2513 to have the valve close based on TDI tank pressure,
- providing additional training for personnel.

2. The Violation Notice alleges that the Polyol Plant (EUPOLTKFARM) violated MI-ROP-B4359-2003b; Section 2; Table C-2.3 EUPOLTKFARM; SC IV.1-3 and MI-ROP-B4359-2003b; Section 2; General Conditions (GC) 19, 20, 21.b, and 23 by failing to report the TDI deviations from TK-536.

AQD asserts that deviations regarding the release of TDI from tank TK-536 were not reported within the semiannual or annual reporting periods in which they occurred (9/15/2017 through 3/15/2022, which are the due dates of the Semi-Annual and Annual Deviation Reports). Specifically, the 67 instances of TDI emission exceedances which are alleged to have occurred prior to 2022 were not reported.

BASF has the following responses to this allegation:

The deviation was not previously reported since it was not discovered until 2022. Corrective actions included providing additional training for personnel.

3. The Violation Notice alleges that the Polyol Plant (EUPOLCONV) violated MI-ROP-B4359-2003b; Section 2; Table C-2.1 EUPOLCONV; SC III.A.3.4 by failing to keep records of the monitored pressure drop across fabric filter F-410C.

AQD asserts that from March 11, 2021, through September 15, 2021, BASF did not keep records of the monitored pressure drop across fabric filter F-410C.

BASF has the following responses to this allegation:

To address a temporary issue, the transmitter at F-410C had its transmitter placed in manual mode, which set a static pressure of "5.0", and overwrote actual data from the transmitter itself. The transmitter was not reset to "Automatic" mode after addressing the temporary issue. The value of 5.0 was logged from 3/11/2021 through 9/15/2021. To prevent reoccurrence the Polyol unit immediately did the following:

- the value coming into the DCS from the field is now historized upstream of the data processing affected by the "Manual"/"Automatic" selection.

- the transmitter has been reprogrammed in the DCS to prevent an operator from putting the value to "Manual" and overwriting the value coming from the device in the field.
4. The Violation Notice alleges that the Polyol Plant (EUPOLCONV) violated MI-ROP-B4359-2003b; Section 2; Table C-2.1 EUPOLCONV; SC IV.1-3 and MI-ROP-B4359-2003b; Section 2; GC 19, 20, 21.c, and 23 for failing to report the pressure drop deviations.

AQD asserts that deviations regarding pressure drop recording across fabric filter F-410C were not reported within the semiannual or annual reporting periods in which they occurred (9/15/2021 and 3/15/2022, which are the due dates of the Deviation Reports).

BASF has the following responses to this allegation:

The deviation was not previously reported since it was not discovered until 2022. The corrective actions undertaken by the Polyol unit in Item 3, will ensure deviations are reported in the future.

Please call (734-324-6523) or e-mail me ([bryan.hughes@basf.com](mailto:bryan.hughes@basf.com)) if you have any questions or would like to discuss the information contained in this response further.

Sincerely,



Bryan J. Hughes  
EHS Team Leader