



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 14, 2022

Joseph Dellamorte
BASF Corporation
1609 Biddle Avenue
Wyandotte, Michigan 48192

SRN: B4359, Wayne County

Dear Joseph Dellamorte:

VIOLATION NOTICE

On September 9, 14, and 15, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of BASF Chemical Plants (BASF) located at 1609 Biddle Avenue, Wyandotte, Michigan. The purpose of this inspection was to determine BASF's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Michigan Air Pollution Control Rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-B4359-2003b; the conditions of Permits to Install (PTI) number 113-07B, 174-08A, 272-04, 84-07, 143-09, 80-11B, 145-17, 14-18, 115-18, and 186-18; and Consent Order AQD number 2018-03. Subsequently, the AQD requested further information from BASF and BASF's response was received on June 9, 2022.

From the inspection and from the additional follow-up with the facility, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPolGraftIndexFilter – This process involves conveying graft polyol through a filter and into another container. This process is uncontrolled.	Rule 201(1)	EUPolGraftIndexFilter does not meet the Permit to Install exemption in Rule 290(2)(a)(ii)(B) because styrene emissions exceeded 20 pounds per month in March 2020, August 2020, November 2020, January 2021, April 2021, and September 2021.

From the facility's June 9, 2022 email, it appears EUPolGraftIndexFilter has operated under Rule 290 since around 2002. Since 1997, Rule 290 has required that, for carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 micrograms per cubic meter (ug/m³), the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. According to the Michigan Air

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Toxics System, available at website www.egle.state.mi.us/itslrsi, styrene has an IRSL of 2 ug/m³. The facility indicated that process EUPolGraftIndexFilter is uncontrolled. As such, styrene emissions from this process are limited to 20 pounds per month.

On June 9, 2022, BASF provided updated records of EUPolGraftIndexFilter emissions to reflect the accurate amount of graft production through the filter. Updated records indicate that styrene emissions exceeded 20 pounds in March 2020, August 2020, November 2020, January 2021, April 2021, and September 2021.

A program for compliance may include a completed PTL application for the EUPolGraftIndexFilter process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 5, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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, Detroit District, at Cadillac Place, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202-6058 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909-7760.

If BASF believes the above observations or statements are inaccurate or do not constitute violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of BASF. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sam Liveson
Senior Environmental Engineer
Air Quality Division
313-405-1357

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cc: Bryan Hughes, BASF
Jordan Thompson, BASF
Tom Wharton, BASF
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE