DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : BASF Toda America LLC	SRN :	P0089
Location : 4750 West Dickman Rd	District :	Kalamazoo
	County :	CALHOUN
City : BATTLE CREEK State: MI Zip Code : 49037 Comp Status	liance s :	Non Compliance
Source Class : MINOR Staf	f: Cody \	(azzie
FCE Begin Date : 9/29/2019 FCE Date	Completion	9/29/2020
Comments : The facility is currently in New Owner Audit Agreen compliance issues with 6V. AQD has used discreti found in the NOAA. Staff did find BASFTA was exc Limit.	on for enforce	ement with violations

List of Partial Compliance Evaluations :

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Activity Date	Activity Type	Compliance Status	Comments
08/26/2020	Scheduled Inspection	Non Compliance	Schedule Inspection

08/11/2020	MACT (Part 63)	Unknown	40CFR63 Subpart VVVVVV Chemical Manufacturing Area Source Rule40CFR63 Subpart VVVVVV Chemical Manufacturing
			the facility the required Notice of Compliance Status Report (NOCSR). In the report it included the following:
			Methods that were used to determine compliance in which BTA employs differential pressure readings for the dust collectors and scrubbers along with the scrubber flow rates. The facility did not conduct performance testing of the affected CMPU's operated during the reporting period.
			BTA has elected to place the following equipment in Delay of Repair: Line1 and 2 Roller Crusher assembly and Line 1 and 2 Sagger Loading systems. Both sets of equipment were not designed in a manner to prevent
			leaks of metal HAP into the work space atmosphere. BTA has installed containment structures designed to enclose the equipment and minimize emissions from sealing surfaces. The effort has reduced but not
			eliminated the fugitive emissions from this equipment. BTA has identified several other process changes designed to minimize leaks from this equipment and will implement those changes during
			the planned shutdown starting on September 1, 2020. The facility stated that BTA employs baghouses, dust collectors, and water scrubbers to comply with the requirements of
			Table#4, control requirements for Batch Process Vents in Metal HAP service. BTA has installed Continuous Monitoring Systems (CMS) to measure differential pressure
			across the subject dust collectors, baghouses, and scrubbers. The project was completed on January 31, 2019. BTA is required to install Bag Leak
			Detection Systems (BLDS) as required by 63.11496(f)(4). This was completed on January 31, 2019. BTA is required to conduct a Performance Test consistent

 63.11410(g)(1) for baghouses. This testing results and initial notice of compliance status were submitted on September 23.2019. BTA is required to develop and implement a monitoring plant here requirements of 63.11496(f)(3)(NA E). This plan was completed and implemented the site-specific monitoring plant he BLDS on January 31, 2019. The facility implemented the site-specific monitoring plant he BLDS on January 31, 2019. The facility indicated that it is compounds, manganese compounds, and nickel compounds. The facility indicated that it is conducting quartery inspection for each quarter of operation. BTA indicated that it is compounds, and nickel compounds. The facility indicated that it is conducting quartery inspection for each quarter of operation. BTA indicated that where open handling of metal HAP is undertaken, the facility maintains closed lid covers on said equipment except when adding or removing materials. Section (E)(ii) of the NOCSR outlines 6 deviations in which the facility was previously in montoring requirements for pressure drop across the dollard deviations are so follows: Deviations from parametric collectors. BTA believes the short intermittent low pressure drop deviations are only explains deviations from the manufacturer Mikropul it install the required corrective measures. Deviations from the manufacturer for pressure drop across the dust collectors. The design faw will be addressed. 			h i i i i i i i i i i i i i i i i i i i	by the design of the second
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08/11/2020	MACT (Part 63)	Unknown	minute in attachment 3 and 4. BTA reported that the magnehelic gauge associated with Aq- SCR960-1A was found to be in malfunction from April 16, 2020 to May 12, 2020 and the magnehelic gauge associated with A2-960-1B was found to be intermittently malfunctioning from February 1, 2020 to May, 2020. The gauges were replaced with new gauges and the systems returned to proper function. The root cause investiga
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03/10/2020	MACT (Part 63)	Unknown	40CFR63 Subpart VVVVV
			Chemical Manufacturing the
			facility the required Notice of
			Compliance Status Report
			(NOCSR). In the report it include
			the following:
			Methods that were used to
			determine compliance in which
			BTA employs differential pressur
			readings for the dust collectors
			and scrubbers along with the
			scrubber flow rates.
			The facility discussed when that
			the test results for the
			performance testing of both
			CMPU's dust collectors was
	·		completed on July 2019. BTA als
			indicated that it has negotiated
			with USEPA a New Owner Audit
			Agreement to address findings
			associated with the review of
			facility operations.
			The facility indicated that there
			was a Delay of Repair for Line 1
			and 2 Roller Crusher assembly
			and Line 1 and 2 Sagger Loadin
			systems. Both sets of equipmen
			were not designed in manner to
			prevent leaks of metal HAP into
			the workspace atmosphere. BTA
			has begun installed a containme
			structures for the equipment. BT
			indicated that the Line 1 system
			will remain in Delay of Repair as
			additional maintenance activities
			are required to repair and preven
			leaks. The Sagger Handling and
			Dumping systems will have
•		1	secondary containment structure
			installed in January 2020.
			The facility stated that BTA
			employs baghouses, dust
			collectors, and water scrubbers
			comply with the requirements of
			Table#4, control requirements for
			Batch Process Vents in Metal
			HAP service.
			BTA has installed Continuous
			Monitoring Systems (CMS) to
			measure differential pressure
			across the subject dust collector
			baghouses, and scrubbers. The
			project was completed on Janua
			31, 2019.
			BTA is required to install Bag Le
	[Detection Systems (BLDS) as
		1	[Detection Oystems (DLDO) as
			required by 63 11/06/f///) This
			required by 63.11496(f)(4). This
			required by 63.11496(f)(4). This was completed on January 31, 2019. BTA is required to conduc

03/10/2020	MACT (Part 63)	Unknown	with the requirements specified in 63.11410(g)(1) for baghouses. This testing results and initial notice of compliance status were submitted on September 23, 2019. BTA is required to develop and implement a monitoring plan consistent with the requirements of 63.11496(f)(3)(i)(A-E). This plan was completed and implemented on January 31, 2019. The facility implemented the site- specific monitoring plan the BLDS on January 31, 2019. The facility indicated that it emits the following HAPS: cobalt compounds, manganese compounds, manganese compounds, and nickel compounds. The facility indicated that it is conducting quarterly inspection for each quarter of operation. BTA indicated that where open handling of metal HAP is undertaken, the facility maintains closed lid covers on said equipment except when adding or removing materials. Section (E)(ii) of the NOCSR outlines 6 deviations in which the facility was previously in non- compliance with requirements of NESHAP 6V. The outlined deviations are as follows: Deviations from parametric monitoring requirements for pressure drop across the dust collectors in attachment 1 and 2. These deviations shown were for A2-dPIA-010 where July 2020 the were no readings recorded for this unit. A1-dPIA-210 the unit recorded days in which readings were out of range for 241 hours. Deviations from parametric monitoring requirements for pressure drop across the scrubbers and deviations from the minimum fresh-water flow requirement of 0.22 gallons per minute in attachment 3. Deviations reported occurred for only a few dates and were never out of range for more than a few hours.
02/25/2020	Meeting Notes		Status Update with CMAS Compliance and Facility's Plans for 2020.

Activity Date	Activity Type	Compliance Status	Comments
10/04/2019	Release Reports	Compliance	On September 19, 2019 BASF Toda America observed an accumulation of powder in the vicinity of A2-BF-330 during a daily inspection. It was reported that following the observation that the Line 2 Jet Mill was immediately shut-down. Facility estimates that approximately one- half pound (0.5) of material is believed to have been released to the roof. The product released was reported as Lithium Hydroxide CAS # 1310-66-3. The duration of the release was believed to be greater than 2 hours but not exceeding 17 hours. Facility identified the Jet Mill and associated equipment that is controlled by BF-330 as being exempt under rule 290. Facility indicated that they reviewed emissions estimates and indicated that the facility did not exceed the 10 pounds per month, controlled emissions limit for lithium
			hydroxide. Cause of the malfunction was believed to be two bags had developed small holes. The report indicated that the facility replaced the bags immediately. BTA also reviewed its maintenance procedures and determined the need to increase the frequency of replacement. BTA also reported that during the review of process operations no upsets or malfunctions were noted.

Name: Cody Mars, Date: 9/29/20 Supervisor: RIL 10/5/20 Page 7 of 7