

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		Compliance Status : Compliance	
Source Class : MINOR		Staff : Cody Yazzie	
FCE Begin Date : 8/27/2023		FCE Completion Date : 8/27/2024	
Comments : The facility has been submitting their NESHAP semi-annual and annual reports as required. The facility appeared to be in compliance during the last inspection.			

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/27/2024	On-site Inspection	Compliance	Scheduled Inspection

02/22/2024	MACT (Part 63)	Compliance	<p>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:</p> <p>The facility indicated that it does not employ hydrazine or organic HAP's that are listed in Table 1 of 40 CFR Part 63, Subpart VVVVVV.</p> <p>The facility reported information which is required by 63.9(h)</p> <p>Methods used to determine compliance - BTA employs differential pressure readings for the dust collectors to evaluate proper operation and compliance with the applicable standard referenced in 40 CFR Part 63 Subpart VVVVVV Table 4.</p> <p>Submittal of any Performance Test, Opacity, or Visible Emissions Observations - The facility did not conduct performance testing of the affected CMPU's operated during the reporting period.</p> <p>Methods used for determining continuing compliance - The facility has implemented practices and procedures designed to meet the Management Practices found in 40 CFR Part 63.11495(a)(3)(i-iii). These practices include Baghouses and dust collectors to comply with the requirements of Table 4 for BPV in Metal HAP service. The control requirement is over 95% or greater removal efficiency for Metal HAP. Installing CMS to measure differential pressure across the subjected dust collectors and baghouses. Installing Bag Leak Detection Systems (BLDS) as required by 40 CFR 63.11496(f)(4).</p> <p>The type and quantity of hazardous air pollutants emitted by the source. Nickel, Cobalt, and manganese are emitted and controlled consistent with requirements for new sources of HAP emissions under the Chemical Manufacture Area Source Rule.</p> <p>The facility is a not a Major Source. BTA has accepted a minor source PTI from the state of Michigan. BTA indicated that they</p>
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02/22/2024	MACT (Part 63)	Compliance	<p>reviewed the Potential to Emit for the Battle Creek Facility and confirmed it's a Synthetic Minor Source of Metal HAP.</p> <p>BTA reported that it had completed all applicable AVO inspections and records for the second half of 2023. Facility also indicated that where open handling of metal HAP is undertaken, the BTA facility maintains closed lids or covers on said equipment except when adding or removing materials.</p> <p>The facility states that it does not operate vessels subject to the requirements of 63.11496 and 63.11497.</p> <p>The facility states that it does not produce, treat, or discharge wastewater subject to the requirements of 63.11498.</p> <p>The facility states that it does not operate small heat exchange systems subject to the requirements of 63.11499.</p> <p>The facility states that it does not transfer or manage reactive or resinous liquids within the regulated CPMU that are defined in 63.11502(b).</p> <p>The facility states that it is not utilizing an alternative or overlapping rule to comply with the requirements of 40 CFR Part 63 Subpart VVVVVV.</p> <p>BTA reported that there were no deviations from reference requirements</p> <p>Signed by responsible official.</p>
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Name:

Coely Yujin

Date:

9/19/24

Supervisor:

Moran