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CERTIFIED MAIL – RETURN RECEIPT REQUESTED
MDEGLE: 7014 1820 0002 3902 8900
MDEGLE: 7014 1820 0002 3902 8917

August 28, 2019

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

Cc: 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_20190724

Dear Mr. Zynda:

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 July 24th, 2019. As confirmed by email dated August 7, 2019, BASF was provided an extension until August 28, 2019 to provide a response.

The Violation Notice alleges that the Polyol Plant (FGPOLCONV) violated MI-ROP-B4359-2003b, Section 2, SC III.A.2.2 and 3, SC III.A.3.4., and SCV.10, Appendix 2-3.1 of Renewable Operating Permit B4359-2003b, as well as R 336.1910.

AQD states that Section 2, SC III A.3.4 requires that records of monitored pressure drop across each fabric filter be maintained and that Section 2, SC III.A.2.2 specifies that the facility install, calibrate and operate in a satisfactory manner a device to monitor the pressure drop across each fabric filter, on a daily basis. AQD alleges that BASF did not provide any pressure drop records for January 2017 through December 2018.

AQD further states that Section 2, Appendix 2-3.1 requires regular inspections of the filter system during scheduled outages and/or downtime or after observing visible emissions but

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not less frequently than every 12 months. AQD alleges that the dust collector records for F-410C were not provided and, according to records provided by BASF, the last inspection/preventative maintenance at F-531 was conducted on March 15, 2017; the due date for the last baghouse inspection was March 15, 2018.

AQD also states that SC V.10 requires that no solid raw materials convey[ance] be conducted unless the associated fabric filter is installed and operated in a satisfactory manner and that R 336.1910 requires that an air-cleaning device be installed, maintained and operated in a satisfactory manner. AQD alleges that BASF was unable to provide up-to-date baghouse inspection records or daily monitored baghouse pressure drop readings. Consequently, AQD alleges that it cannot determine that the baghouses are installed and operating in a satisfactory manner.

BASF has investigated the alleged violations and has the following responses to each allegation:

Daily Pressure Drop Readings – Historically, the #8 & #9 Magnesium silicate conveyor filter pressure-drop readings were electronically recorded in the Polyol unit DCS (digital control system) on a continual basis from the differential pressure gages on each primary filter (F531 & F-410C). This recorded information was typically gathered every 2 years when requested by AQD personnel. When requested in 2019, it was discovered that the data was no longer being recorded in the DCS due to DCS programing changes made in 2016. This resulted in missing pressure drop records going back to August 2016 for the #8 conveyor system and April 2016 for the #9 system. While these monitoring records are missing, BASF contends that each conveyor filter system was operating properly during the time period in question. This is based on evidence found when inspecting the vacuum blower systems on both filter systems. Both vacuum blowers that draw air through the primary filters also have a secondary filter on the outlet of the blower (downstream of the primary filter). When inspected in both 2017 and 2018 (see the attached inspection reports), neither system indicated abnormal operation of the primary filter system where the secondary filters captured excess dust from the upstream vacuum blower and primary filter. Further, had leaks and or other operational problems occurred past these secondary filters, there likely would have been visible emissions from the system that would have been observed by operators performing daily rounds of the area. They would have reported this through our incident management system and/or our maintenance work order system, neither of which occurred during this time period.

Corrective Actions: Since the issuance of the Violation Notice, datalogging of the required differential pressure data has been restored in the DCS. The #8 system differential pressure drop readings were restored on 08/02/19 and on 08/16/19 for the #9 system. Also, to prevent future recurrence, a preventative maintenance plan has been developed to verify the data quality and to calibrate the instrument as needed on an annual basis. A monthly task has also been added to verify that incoming data is present and recorded in the system.

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Annual Inspections – Annual inspections of pollution control equipment are scheduled and documented through our SAP Preventative Maintenance (PM) system. As part of a system-wide change to the inspection frequency of structural components, some PM records were placed in a "locked" or hold state while the PM changes were made. In the case of the F531 and F410C, the system was inadvertently not returned to active status once these changes were made and therefore the inspections were not scheduled or completed. However, as mentioned above, the vacuum blower and associated secondary filters were inspected annually on both filter systems (F531 & F410C). Because they were inspected in 2017 and 2018 and because these components are downstream of the primary filter, the integrity of the filter system was maintained during the period in question and does indicate that the system as a whole was installed and operating properly.

Corrective Actions: BASF has restored the SAP PM system status for the primary filters to active and completed the internal inspection of both F531 & F410C on 8/16/19. Attached are the records for each of these inspections.

Should you have any concerns or questions regarding the information contained in this response please contact me at 734-324-6102.

Sincerely,

Jordan Thompson
Sr. EHS Specialist

Enclosures (4)

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