



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

July 1, 2016

Mr. Jordan Thompson
BASF Corporation
1609 Biddle Avenue
Wyandotte, Michigan 48192

SRN: B4359, Wayne County

Dear Mr. Thompson:

VIOLATION NOTICE

On September 14, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), issued Permit to Install (PTI) No. 113-07A for the installation and operation of the Joncryl Polymers plant to the BASF Chemical Plants (BASF) stationary source located at 1609 Biddle Avenue, Wyandotte, Michigan. The PTI includes testing Special Conditions (SC) necessary to ensure and to determine compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and emissions standards located with the SCs of PTI 113-07A .

During a review of PTI 113-07A, staff identified the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-RTO: Regenerative thermal oxidizer system used to control VOC emissions from multiple emission units at the Joncryls Polymer plant	PTI 113-07A, FG-RTO, SC V.1	The facility failed to verify and quantify the ethyl acrylate emission rate and total organic carbon (TOC) destruction efficiency within 180 days after PTI issuance.

SC V.1 of FG-RTO V.1 states the following.

“Within 180 days after permit issuance and every five years thereafter, the permittee shall verify and quantify the ethyl acrylate emission rate and TOC destruction efficiency from FG-RTO by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.”

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Thus, a test plan was required to be submitted by January 12, 2016 and testing completed by March 12, 2016. At this time, the AQD has not received a test plan or testing results for FG-RTO.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 22, 2016 (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.

If BASF believes the above observations or statements are inaccurate or do not constitute violations 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. 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,



Todd Zynda, P.E.
Environmental Engineer
Air Quality Division
313-456-2761

cc/via e-mail: Mr. Bryan Hughes, BASF
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ