



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 24, 2019

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

SRN: B4359, Wayne County

Dear Mr. Thompson:

VIOLATION NOTICE

On January 24 and 25, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of BASF Chemical Plants 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 Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) MI-ROP-B4359-2003b.

As a result of the inspections on January 24 and 25, 2019, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Polyols Plant - FGPOLCONV	MI-ROP-B4359-2003b, Section 2, SC III.A.2.2 and 3, SC III.A.3.4, and SC V.10, Appendix 2-3.1 R 336.1910	Pressure drop records are not maintained for the baghouses. Baghouse inspections are not completed every 12 months.

Polyols Plant - FGPOLCONV

MI-ROP-B4359-2003b, Section 2, SC III.A.3.4 requires that records of monitored pressure drop across each fabric filter be maintained. MI-ROP-B4359-2003b, Section 2, SC III.A.2.2 specifies that BASF install, calibrate, and operate in a satisfactory manner a device to monitor the pressure drop across each fabric filter on a daily basis. BASF did not provide any pressure drop records for the period requested (January 2017 through December 2018).

MI-ROP-B4359-2003b, Section 2, Appendix 2-3.1 requires that regular inspections be conducted during scheduled outages or downtime, or after observing visible emissions but not less frequently than every 12 months. On June 10, 2019 BASF provided dust collector maintenance records for F-531. The dust collector records for F-410C were not provided. According to the records provided the last inspection/preventative maintenance at F-531 was conducted March 15, 2017. The due date for the last baghouse inspection(s) was March 15, 2018.

Mr. Jordan Thompson
BASF Corporation
Page 2
July 24, 2019

SC. V.10 requires that no solid raw materials conveying be conducted unless the associated fabric filter is installed, maintained, and operated in a satisfactory manner. Similarly, R 336.1910 requires that an air-cleaning device be installed, maintained, and operated in a satisfactory manner. BASF was unable to provide baghouse inspection records that are up to date or daily monitored baghouse pressure drop readings. Therefore, the AQD cannot determine that the baghouses are installed and operating in a satisfactory manner. Collectively, BASF is in violation of MI-ROP-B4359-2003b, Section 2, SC III.A.2.2 and 3, SC III.A.3.4, and SC V.10, Appendix 2-3.1 and R 336.1910.

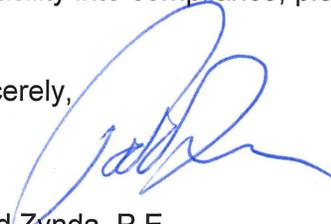
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 14, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. 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 violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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

Sincerely,



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

cc: Mr. Bryan Hughes, BASF
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jeff Korniski, EGLE