

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 : 8/17/2021	FCE Completion Date : 8/17/2022
Comments : Facility has been submitting their Notice of Compliance Status reports required by the NESHAP VVVVVV. The most recent inspection appeared to show the facility was in compliance with PTI No. 70-10B.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/17/2022	On-site Inspection	Compliance	Schedule Inspection

02/16/2022	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:  BTA completed a capital project in November of 2020 to replace water scrubbers employed for control of metal HAP emitted from the kiln systems for Lines # 1&amp;2 with cartridge style dust collectors.</p> <p>The facility reported information which is required by 63.9(h)  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.  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.  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).  The facility is a not a Major Source.  BTA reported that it had completed all applicable AVO inspections and records for the first half of 2021. 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</p>
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02/16/2022	MACT (Part 63)	Compliance	<p>adding or removing materials. BTA reported high differential pressure readings for Line 2 baghouse AF-210 were experienced. The differential pressure was outside of the operating parameters for a 24-hour period. Investigation of the issue showed that particulate build up on the filter media due to the pulse air system being offline due to maintenance. The system was reactivated and was reported as performing as designed. The facility also indicated that the downstream Bag Leak Detection System showed no evidence of release of particulate, and no evidence of release or impact to the site, community, or environment could be noted. BTA elected to capitalize on a project to repair and replace the gland packing seals with mechanical seals for production process equipment number SCO-440 for production Line 1 and 2. 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. The facility states that it does not operate small heat exchange systems subject to the requirements of 63.11499. The facility states that it does not transfer or manage reactive or resinous liquids within the regulated CMPU that are defined in 63.11502(b). 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>Facility did report that there was a 25-hour period in which the Line 2 baghouse AF-210 was outside operating parameters. However due to the immediate correction and issue appearing to be resolved. Staff has decided a Violation Notice is not warranted at this time. If the issue persists a Violation Notice could be sent at a later date.</p>
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10/06/2021	Rule 912	Compliance	<p>BASF Toda submitted a Rule 912 written notification on September 27, 2021. In the report the facility stated that on September 12, 2021 during an inspection of the building roof at approximately 1800 PM EDT that a white staining was observed on the building wall and roof in direct proximity to the discharge of A2-BF-330 dust collector. The facility clarified that this dust collector is associated with process equipment JM-320, which supports the processing of NCM for the Line#2 operations. BASF indicated in their report that the released chemical was lithium hydroxide monohydrate and approximately less than 1 lbs. was released. It was reported that the process was immediately shutdown and efforts were taken to clean up the release and determine the immediate root cause.</p> <p>After a root causes determination performed by BASF Toda they believe the release occurred for a period of time between 10 and 20 minutes.</p> <p>BASF Toda also determined that the cause of the release was due to a filter sock was ruptured. BASF Toda stated that the system was shutdown and all 25 bag filters were replaced. The facility stated that the unit was placed back into service and did not leak after repairs were made and the process was brought back online. BASFTA stated that the differential pressure readings were evaluated after startup to ensure the repairs addressed the concern. It was reported that A2-BF-330 unit maintained an average differential pressure of 1.5" – 1.8" of water column after the corrective measures were implemented.</p> <p>The facility also conducted a visual observation of the roof and stack post start-up. Staff decided that a violation notice will not be sent at this time due to the release amount being less than 1 pound and corrective action seemed to be taken immediately and fixed. If problems seem to repeat/continue one may be sent at a different time. - G.IY</p>
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08/18/2021	MACT (Part 63)	<p>40CFR63 Subpart VVVVVV Chemical Manufacturing Area Source Rule 40CFR63 Subpart VVVVVV Chemical Manufacturing the facility the required Notice of Compliance Status Report (NOCSR). In the report it included the following:  BTA completed a capital project in November of 2020 to replace water scrubbers employed for control of metal HAP emitted from the kiln systems for Lines # 1&amp;2 with cartridge style dust collectors.</p> <p>The facility reported information which is required by 63.9(h) 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. 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. 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). The facility is a not a Major Source.  BTA reported that it had completed all applicable AVO inspections and records for the first half of 2021. 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</p>
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08/18/2021	MACT (Part 63)	<p>adding or removing materials. BTA reported that for the month of February and March 2021. A1-DM-210 BLDS data did not meet the requirements of less than 30 Picoamps. BTA reported that the associated BLDS for A1-DM-210 was defective. The facility removed the duct monitor out of service and replaced with a back. The dust monitor was removed from operation and sent to the manufacture for calibration. BTA elected to capitalize on a project to repair and replace the gland packing seals with mechanical seals for production process equipment number SCO-440 for production Line 1 and 2. The facility states that it does not operate vessels subject to the requirements of 63.11496 and 63.11497. The facility states that it does not produce, treat, or discharge wastewater subject to the requirements of 63.11498. The facility states that it does no operate small heat exchange systems subject to the requirements of 63.11499. The facility states that it does not transfer or manage reactive or resinous liquids within the regulated CPU that are defined in 63.11502(b). 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>
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Name: Coely Yungui Date: 9/20/22 Supervisor: RIC 9/21/22