

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

## FCE Summary Report

<b>Facility :</b> BASF Corporation - Chemical Plants	<b>SRN :</b> B4359
<b>Location :</b> 1609 BIDDLE AVE	<b>District :</b> Detroit
	<b>County :</b> WAYNE
<b>City :</b> WYANDOTTE <b>State:</b> MI <b>Zip Code :</b> 48192	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Samuel Liveson
<b>FCE Begin Date :</b> 8/1/2022	<b>FCE Completion Date :</b> 8/1/2023
<b>Comments :</b> Based on a facility inspection and records review, facility appears to be in compliance with applicable rules and regulations. 11/14/22 Semi 1 Non-Compliance was resolved with Consent Order AQD 2023-14.	

## List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/01/2023	On-site Inspection	Compliance	Scheduled inspection.
05/24/2023	MACT (Part 63)	Compliance	Polyether Polyol Production (Subpart PPP) MACT LDAR report (per 63.1439(e)(6) and PTI 143-09, FGPOLFUG, SC III.A.2.1) and reports of malfunctions per 63.1439(b)(1)(ii). 0 leaks out of 998 valves monitored; 0 leaks out of 17-19 pumps monitored monthly. 0 leaks out of 2,733 connectors monitored. No components for which repairs were delayed. 0 pressure relief device leaks out of 24 pressure relief devices monitored. No excess emission events (upsets or malfunctions) and/or monitoring parameter exceedances to report for the period.
05/23/2023	ROP Other	Compliance	Non-MACT LDAR Report. No leaks detected with FID out of 88 agitators, 5342 connectors, 224 pressure relief valves, 410 pumps, and 2079 valves tested between Graft Polyols and WYDR Plant. Appears to comply with PTI 113-07B, FGJONFACILITY, SC III.1, and PTI 143-09, FGPOLFUG, SC III.A.2.2 (previously MI-ROP-B4359-2003b, FGPOLFUG, III.A.2.2).

Activity Date	Activity Type	Compliance Status	Comments
05/18/2023	Annual Emissions Report (or MAERS)	Compliance	MAERS report submitted electronically on 3/15/2023. Emission comparison indicates reasonable fluctuations in throughput and emissions compared to the previous year. RGJonResin and RGJonResinCut throughput increased by factor of 1000 to 8537 E3 gallon and 8106 E3 gallon respectively. AQD confirmed this is correct via email with the facility.
04/03/2023	ROP Annual Cert	Compliance	No deviations from Section 1 ROP conditions were reported for the annual reporting period.
04/03/2023	ROP Annual Cert	Compliance	ROP Annual Certification received. 13 deviations reported. These are 9 deviations which were also reported for the first semi-annual reporting period of 2022, and 4 deviations which were also reported for the second semi-annual reporting period of 2022. Please see those semi-annual certifications for additional AQD comments.
04/03/2023	ROP Annual Cert	Compliance	No deviations from Section 3 ROP conditions were reported for the annual reporting period.
04/03/2023	ROP Annual Cert	Compliance	No deviations from Section 4 ROP conditions were reported for the annual reporting period.
03/30/2023	ROP Other	Compliance	2022 ROP MAERS Certification Report Form Received

Activity Date	Activity Type	Compliance Status	Comments
03/22/2023	ROP SEMI 2 CERT	Compliance	Four deviations reported. Two deviations are for FG-RTO bypass valve emissions. (1) 4.73 lbs VOC over 12 minutes on 7-22-22 due to a compressor fault; I/O will be replaced after it is received from the supplier. (2) 3.23 lbs VOC over 15 minutes on 9-19-22 due to a level switch faulting; a delay timer was added and a connection was hard-wired to eliminate material contacting the level switch and causing this fault. These two deviations appear to meet the definition of a malfunction as defined Subpart A, §60.2. The third deviation is for RTO temperature 3-hour averages below 1548.23 °F (50 °F below the average temperature of the passing 9-21-17 RTO stack test of 1598.23 °F) from 9-21-2017 to 5-13-2020, due to the RTO setpoint being at 1550 °F. The facility is reviewing the data and updating the confirmed deviations to report in the next deviation report. AQD may issue a violation notice upon receiving temperature records indicating a violation of PTI 113-07B FG-RTO SC IV.1. The fourth deviation relates to failure to report 3-hour temperature deviations during previous compliance reporting periods.
03/21/2023	ROP SEMI 2 CERT	Compliance	No deviations from Section 1 ROP conditions were reported for the semi-annual reporting period.
03/21/2023	ROP SEMI 2 CERT	Compliance	No deviations from Section 3 ROP conditions were reported for the semi-annual reporting period.
03/21/2023	ROP SEMI 2 CERT	Compliance	No deviations from Section 4 ROP conditions were reported for the semi-annual reporting period.

Activity Date	Activity Type	Compliance Status	Comments
11/14/2022	ROP Semi 1 Cert	Non Compliance	3 deviations for Section 2 of the ROP: (1) EUPOLCONV - "Failure to report a deviation (a failure to maintain records of the pressure drop at fabric filter F-410C)." (2) EUPOLTKFARM - From January 1, 2017 through December 31, 2021, during unloading of toluene diisocyanate (TDI), a pressure safety valve (PSV) lifted 67 times over 657 minutes and released 2.028 pounds of TDI. From January 8, 2022 through May 1, 2022, during TDI unloading, the PSV lifted 42 times over 376 minutes and released 1.16 pounds of TDI. (3) EUPOLTKFARM - "Failure to report a deviation (release of TDI from tank TK-536 - see above)." Facility will receive a violation notice for section 2 deviations.
11/03/2022	MACT (Part 63)	Compliance	PPP MACT LDAR report (63.1434 (f) and PTI 143-09, FGPOLFUG, SC III.A.2.1) and SSMR per 63.1439(b)(1)(ii). 1 leaks out of 102 valves monitored; 0 leaks out of 17 pumps monitored monthly. No components for which repairs were delayed. No excess emission events (upsets or malfunctions) to report for the SSMR.
11/03/2022	ROP Semi 1 Cert	Compliance	No deviations from Section 1 ROP conditions were reported for the semi-annual reporting period.
11/03/2022	ROP Semi 1 Cert	Compliance	No deviations from Section 3 of the ROP were reported for the semi-annual reporting period.

Activity Date	Activity Type	Compliance Status	Comments
11/03/2022	ROP Semi 1 Cert	Compliance	6 deviations for FG-RTO venting directly to atmosphere involving PTI No. 113-07B; FG-RTO SC IV.1, and FG-RAWMATL/EUJONTK-0004 SC III.1. (1) Due to no pressure differential being read due to issue with heat tracing. 1/26/22-91 minutes. (2) Plant air compressor failure; a replacement motor was installed. 2/17/22 – 101 mins. (3) Plant air pressure drop; compressor serviced by Metro Air. 3/12/22 - 19 minutes. (4) Power outage. 4/24/22 – 40 minutes. (5) Vapors from cleaning of SGO train caused RTO temperature to increase. 5/3/22 – 40 minutes. (6) RTO temperature increase due to vapor buildup. 5/30/22 – 7 minutes. Bypass appears to follow protocol in FG-RTO SC VI.3.c (discontinue RTO emissions if corrective actions not complete in one hour) per facility discussions 5/6/22. Deviations appear to meet the definition of a malfunction as defined Subpart A, §60.2.
11/03/2022	ROP Other	Compliance	Non-MACT LDAR Report. No leaks detected with FID out of 88 agitators, 2129 connectors, 226 pressure relief valves, 245 pumps, and 1167 valves tested. Appears to comply with PTI 113-07B, FGJONFACILITY, SC III.1, and PTI 143-09, FGPOLFUG, SC III.A.2.2.

Name:

Star

Date:

4/9/24

Supervisor:

JK