



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



DANIEL EICHINGER
ACTING DIRECTOR

March 24, 2023

VIA EMAIL ONLY

Joseph Dellamorte
BASF Corporation - Chemical Plants
1609 Biddle Avenue
Wyandotte, Michigan, 48192

SRN: B4359, Wayne County

Dear Joseph Dellamorte:

VIOLATION NOTICE

On March 16, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received written communication from BASF Corporation - Chemical Plants (BASF) located at 1609 Biddle Avenue, Wyandotte, Michigan. BASF provided information regarding compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Michigan Air Pollution Control Rules (Rules); and the conditions of the facility's ROP number MI-ROP-B4359-2003b.

From BASF's provided information, staff identified the following:

Process Description	Rule/Permit Condition Violated	Comments
Polyols Plant – EUPOLTKFARM – This emission unit includes the toluene diisocyanate (TDI) storage tank TK-536 and TDI loading/unloading.	MI-ROP-B4359-2003b; Section 2; Table C-2.3 EUPOLTKFARM; Special Condition (SC) II.B.1.1 Rule 702(a)	Emissions of TDI exceeded the emission limit of 0.0031 pounds per hour in four tanker truck loading instances in January 2023.

BASF's provided information demonstrates that the pressure safety valve for the BASF TDI tank lifted for three minutes on January 3, 2023; for six minutes on January 8, 2023; for twelve minutes on January 17, 2023; and for seven minutes on January 19, 2023, resulting in actual emissions of TDI from the tanker truck loading process equipment of 0.0864 pounds TDI over a total of 28 minutes. Assuming TDI emission quantities relate to the amount of time the pressure safety valve lifted, it appears the following amounts of TDI were emitted during each of the four pressure safety valve lifting events:

Date	Duration of Pressure Safety Valve Lift	Assumed TDI Emissions (lbs)
January 3, 2023	3 minutes	0.0093
January 8, 2023	6 minutes	0.0185
January 17, 2023	12 minutes	0.0370
January 19, 2023	7 minutes	0.0216

Joseph Dellamorte
BASF Corporation – Chemical Plants
Page 2
March 24, 2023

The conditions of ROP number MI-ROP-B4359-2003b limit the emissions of TDI to 0.0031 pounds per hour. Emissions during each of these four events exceeded this limit.

The TDI hourly emission limit in MI-ROP-B4359-2003b is established pursuant to Rule 702(a), which reads as follows:

Rule 702. A person who is responsible for any new source of volatile organic compound emissions shall not cause or allow the emission of volatile organic compound emissions from the new source in excess of the lowest maximum allowable emission rate of the following: (a) The maximum allowable emission rate listed by the department on its own initiative or based upon the application of the best available control technology.

Because this maximum allowable emission rate was exceeded, this is a violation of Rule 702(a).

Please initiate and continue actions necessary to correct the cited violation. AQD believes BASF's provided information from March 16, 2023 constitute an adequate response to this violation notice. BASF's provided information is enclosed. BASF's provided information discuss 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 what steps are being taken to prevent a reoccurrence. A written response to this violation notice by the facility is not required.

If BASF has additional information to provide in response to this violation notice, please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202-6058 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. This information should be received by April 14, 2023 (which coincides with 21 calendar days from the date of this letter).

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.

Joseph Dellamorte
BASF Corporation – Chemical Plants
Page 3
March 24, 2023

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,

A handwritten signature in black ink, appearing to read "Sam Liveson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sam Liveson
Senior Environmental Engineer
Air Quality Division
313-405-1357

Enclosure

cc: Bryan Hughes, BASF
Tom Wharton, BASF
Jordan Thompson, BASF
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE