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CERTIFIED MAIL – RETURN RECEIPT REQUESTED
MDEGLE-Liveson: 7019 1640 0001 1822 9634
MDEGLE-Camilleri: 7019 1640 0001 1822 9641
AND VIA E-MAIL

July 1, 2022

Sam Liveson - Senior Environmental Engineer
Michigan Department of Environment, Great Lakes & Energy - Air Quality Division
Cadillac Place – Suite 2-300
3058 West Grand Boulevard
Detroit, MI 48202-6058

Jenine Camilleri – Enforcement Unit Supervisor
Michigan Department of Environment, Great Lakes & Energy - Air Quality Division
P.O. Box 30260
Lansing, MI 48909-7760

Re: BASF Wyandotte Response to Violation Notice - B4359 VN 20220614

Dear Mr. Liveson:

BASF Corporation (“BASF”) is submitting this response to the Violation Notice issued by the Air Quality Division (“AQD”) to BASF’s Wyandotte, Michigan plant (the “facility” or the “site”) on June 14, 2022.

The Violation Notice alleges that the Polyol Plant (EUPolGraftIndexFilter) violated Rule 201(1).

AQD states that EUPolGraftIndexFilter does not meet the Permit to Install exemption in Rule 290(2)(a)(ii)(B) because styrene emissions exceeded 20 pounds per month in March 2020, August 2020, November 2020, January 2021, April 2021, and September 2021.

BASF investigated the alleged violations and has the following responses to the allegation:

The original Graft Index Filter emission calculation basis (~2002) was developed using a mass balance approach of the residual monomers/solvents in pre and post filtered graft polyol. It conservatively assumed all residual losses in the before/after filtrate went to the



The Chemical Company

stack and none ended up in the filter paper, filtered solids, product waste or indoor environment. At the time, this emission calculation method resulted in emission levels that were below the Rule 290 threshold due to lower Graft Polyol throughput. Subsequently, there have been process optimizations and increases in production that resulted in the excess emissions as noted above. As shown in the attached monthly emissions summary, Styrene has not exceeded the monthly limit in 2022.

BASF will be submitting a permit application for the emission unit to remedy the overestimation of emissions of Rule 290 - 10/20 lb/month compounds. An application will be submitted to EGLE no later than August 26, 2022.

Please call (734-324-6523) or e-mail me (bryan.hughes@basf.com) if you have any questions or would like to discuss the information contained in this response further.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan J. Hughes", with a long horizontal line extending to the right.

Bryan J. Hughes
EHS Team Leader