



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

February 25, 2020

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

SRN: B4359, Wayne County

Dear Mr. Thompson:

**VIOLATION NOTICE**

On November 26, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed stack testing of the regenerative thermal oxidizer (RTO) at the Wyandotte Resins Plant (WYDR) at BASF Chemical Plants located at 1609 Biddle Avenue, Wyandotte, Michigan. On January 28, 2020 the WYDR RTO stack test report dated January 23, 2020 was received. As part of the review of the emission test report for the WYDR RTO, the AQD evaluated 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; the conditions of Permit to Install (PTI) number 113-07B; and Consent Order AQD No. 2018-03.

As a result of the review of the WYDR RTO stack test report, the following violation was identified:

Process Description	Rule/Permit Condition Violated	Comments
Wyandotte Resins – FG-RTO	PTI 113-07B, FG-RTO, SC IV.1;  R336.1702(a);  R336.1910;  Consent Order AQD No. 2018-03, Paragraph 10.B.	BASF reports the VOC destruction efficiency was 95% during the November 26, 2019 stack test. SC IV.1 requires a minimum destruction efficiency of 98%.

**Wyandotte Resins – FG-RTO**

PTI 113-07B, FG-RTO, SC IV.1 requires that the 3-hour average firebox temperature be maintained at 28°C (50°F) below the average temperature during the most recent performance test at which compliance was demonstrated or higher, reducing the total

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organic compound (TOC), minus methane and ethane, by 98%. Consent Order AQD No. 2018-03 requires that on and after the effective date (May 7, 2018), the Company shall comply with the minimum VOC destruction efficiency limit for FG-RTO in PTI 113-07A, as amended.

On January 28, 2020, the AQD received BASF's test report of the VOC destruction efficiency test conducted on November 26, 2019 of the WYDR RTO. BASF reports the total gaseous organics (TGO) destruction efficiency was 95%. This is a violation of PTI 113-07B, FG-RTO, SC IV.1. Compliance with the 98% destruction efficiency was not demonstrated during the November 26, 2019 stack test, and therefore a minimum firebox temperature cannot be established. The average temperature of the RTO during the performance test, approximately 1553°F, was determined to be insufficient to achieve the required destruction efficiency.

PTI 113-07B, FG-RTO, SC IV.1 includes an underlying applicable requirement of R 336.1702(a). R336.1702(a) requires that "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." Based on the stack test results from November 26, 2019, BASF is not meeting this requirement.

R336.1910 requires that "an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law." Because the RTO is not achieving the required destruction efficiency, this is a violation of R 336.1910. The RTO is not operating in a satisfactory manner to achieve the required destruction efficiency.

Furthermore, not achieving the required VOC destruction efficiency is also a violation of Consent Order AQD No. 2018-03, Paragraph 10.B, and may be subject to stipulated penalties per Paragraph 14.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 17, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: 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 the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

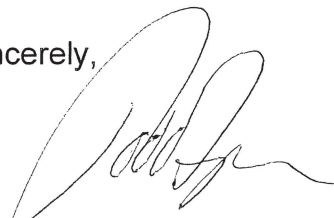
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Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing,  
Michigan 48909-7760.

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 violation cited above and for the cooperation that was extended to me during my observation of the stack test. 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,



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

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. April Wendling, EGLE  
Mr. Jeff Korniski, EGLE