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 :**	Non Compliance
Source Class :	MINOR	**Staff :**	Cody Yazzie
FCE Begin Date :	9/29/2019	**FCE Completion Date :**	9/29/2020
Comments :	The facility is currently in New Owner Audit Agreement (NOAA) with the USEPA for compliance issues with 6V. AQD has used discretion for enforcement with violations found in the NOAA. Staff did find BASFTA was exceeding 12-month rolling Nickel Limit.		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/26/2020	Scheduled Inspection	Non Compliance	Schedule Inspection

08/11/2020	MACT (Part 63)	Unknown	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: Methods that were used to determine compliance in which BTA employs differential pressure readings for the dust collectors and scrubbers along with the scrubber flow rates. The facility did not conduct performance testing of the affected CMPU's operated during the reporting period. BTA has elected to place the following equipment in Delay of Repair: Line1 and 2 Roller Crusher assembly and Line 1 and 2 Sagger Loading systems. Both sets of equipment were not designed in a manner to prevent leaks of metal HAP into the work space atmosphere. BTA has installed containment structures designed to enclose the equipment and minimize emissions from sealing surfaces. The effort has reduced but not eliminated the fugitive emissions from this equipment. BTA has identified several other process changes designed to minimize leaks from this equipment and will implement those changes during the planned shutdown starting on September 1, 2020. The facility stated that BTA employs baghouses, dust collectors, and water scrubbers to comply with the requirements of Table#4, control requirements for Batch Process Vents in Metal HAP service. BTA has installed Continuous Monitoring Systems (CMS) to measure differential pressure across the subject dust collectors, baghouses, and scrubbers. The project was completed on January 31, 2019. BTA is required to install Bag Leak Detection Systems (BLDS) as required by 63.11496(f)(4). This was completed on January 31, 2019. BTA is required to conduct a Performance Test consistent

08/11/2020	MACT (Part 63)	Unknown	with the requirements specified in 63.11410(g)(1) for baghouses. This testing results and initial notice of compliance status were submitted on September 23, 2019. BTA is required to develop and implement a monitoring plan consistent with the requirements of 63.11496(f)(3)(i)(A-E). This plan was completed and implemented on January 31, 2019. The facility implemented the site-specific monitoring plan the BLDS on January 31, 2019. The facility indicated that it emits the following HAPS: cobalt compounds, manganese compounds, and nickel compounds. The facility indicated that it is conducting quarterly inspection for each quarter of operation. BTA indicated that where open handling of metal HAP is undertaken, the facility maintains closed lid covers on said equipment except when adding or removing materials. Section (E)(ii) of the NOCSR outlines 6 deviations in which the facility was previously in non-compliance with requirements of NESHAP 6V. The outlined deviations are as follows: Deviations from parametric monitoring requirements for pressure drop across the dust collectors in attachment 1 and 2. BTA believes the short intermittent low pressure drop deviations are due to an inherent design flaw in the primary dust collectors. BTA explains deviations are only experienced by the dust collectors located on the west side of the manufacturing building. BTA reviewed the BLDS data and there were no leaks associated with the baghouses during the low pressure drop deviations. The design flaw will be addressed during the fall production outage. BTA has contracted with the manufacturer Mikropul it install the required corrective measures. Deviations from parametric monitoring requirements for pressure drop across the scrubbers and deviations from the minimum fresh-water flow requirement of 0.22 gallons per

08/11/2020	MACT (Part 63)	Unknown	minute in attachment 3 and 4. BTA reported that the magnehelic gauge associated with Aq-SCR960-1A was found to be in malfunction from April 16, 2020 to May 12, 2020 and the magnehelic gauge associated with A2-960-1B was found to be intermittently malfunctioning from February 1, 2020 to May, 2020. The gauges were replaced with new gauges and the systems returned to proper function. The root cause investiga

03/10/2020	MACT (Part 63)	Unknown	40CFR63 Subpart VVVVVV Chemical Manufacturing the facility the required Notice of Compliance Status Report (NOCSR). In the report it included the following: Methods that were used to determine compliance in which BTA employs differential pressure readings for the dust collectors and scrubbers along with the scrubber flow rates. The facility discussed when that the test results for the performance testing of both CMPU's dust collectors was completed on July 2019. BTA also indicated that it has negotiated with USEPA a New Owner Audit Agreement to address findings associated with the review of facility operations. The facility indicated that there was a Delay of Repair for Line 1 and 2 Roller Crusher assembly and Line 1 and 2 Sagger Loading systems. Both sets of equipment were not designed in manner to prevent leaks of metal HAP into the workspace atmosphere. BTA has begun installed a containment structures for the equipment. BTA indicated that the Line 1 system will remain in Delay of Repair as additional maintenance activities are required to repair and prevent leaks. The Sagger Handling and Dumping systems will have secondary containment structures installed in January 2020. The facility stated that BTA employs baghouses, dust collectors, and water scrubbers to comply with the requirements of Table#4, control requirements for Batch Process Vents in Metal HAP service. BTA has installed Continuous Monitoring Systems (CMS) to measure differential pressure across the subject dust collectors, baghouses, and scrubbers. The project was completed on January 31, 2019. BTA is required to install Bag Leak Detection Systems (BLDS) as required by 63.11496(f)(4). This was completed on January 31, 2019. BTA is required to conduct a Performance Test consistent

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02/25/2020	Meeting Notes		Status Update with CMAS Compliance and Facility's Plans for 2020.

Activity Date	Activity Type	Compliance Status	Comments
10/04/2019	Release Reports	Compliance	On September 19, 2019 BASF Toda America observed an accumulation of powder in the vicinity of A2-BF-330 during a daily inspection. It was reported that following the observation that the Line 2 Jet Mill was immediately shut-down. Facility estimates that approximately one-half pound (0.5) of material is believed to have been released to the roof. The product released was reported as Lithium Hydroxide CAS # 1310-66-3. The duration of the release was believed to be greater than 2 hours but not exceeding 17 hours. Facility identified the Jet Mill and associated equipment that is controlled by BF-330 as being exempt under rule 290. Facility indicated that they reviewed emissions estimates and indicated that the facility did not exceed the 10 pounds per month, controlled emissions limit for lithium hydroxide. Cause of the malfunction was believed to be two bags had developed small holes. The report indicated that the facility replaced the bags immediately. BTA also reviewed its maintenance procedures and determined the need to increase the frequency of replacement. BTA also reported that during the review of process operations no upsets or malfunctions were noted.

Name: Cody Yeager **Date:** 9/29/20 **Supervisor:** RJL 10/5/20