

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N133672703

FACILITY: BASF CORPORATION	SRN / ID: N1336
LOCATION: 26701 Telegraph Road, SOUTHFIELD	DISTRICT: Warren
CITY: SOUTHFIELD	COUNTY: OAKLAND
CONTACT: Jeff Ammonite , EHS Specialist	ACTIVITY DATE: 06/26/2024
STAFF: Jillian Cellini	COMPLIANCE STATUS: Non Compliance
SUBJECT: Evaluate BASF's compliance with MI-ROP-N1336-2020 and State and Federal air quality rules and regulations.	
RESOLVED COMPLAINTS:	

On June 26, 2024, I (Jillian Cellini, EGLE-AQD) and Iranna Konanahalli conducted an inspection of BASF Corporation – BASF Automotive R & D Campus located at 26701 Telegraph Road, in Southfield, MI. The purpose of the inspection was to determine the facility's compliance status with the requirements of the federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended (Act 451), the AQD administrative rules, and Renewable Operating Permit (ROP) MI-ROP-N1336-2020.

We arrived at BASF at about 12:00 PM. At the facility, we met with Jeff Ammonite (EHS Specialist) and Mariana Runho (EHS Specialist). We introduced ourselves and stated the purpose of the inspection. Jeff and Mariana answered some of our initial questions before the facility walk-through, and then began showing us around the facility.

Jeff Ammonite sent the requested records to determine compliance via email following the inspection. The digital records are in the AQD Warren shared drive at: S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024.

BASF is one of the largest producers of chemicals in the world. This site is focused on research and development for automotive paint. According to Jeff, this BASF facility is open Monday through Friday, from around 8 AM to 5 PM, and has around 250 employees in the office at a time. Jeff and Mariana explained that there are also field service technicians that are based out of this office, but they are typically in the field. This brings the official employee count of this office to around 550 people. This BASF facility is located in Oakland County, Michigan, which is designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants. This facility is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit any single HAP regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year. It is immediately surrounded by other commercial properties, and the closest residential area is approximately 0.15 miles west of the facilities. Carpenter Lake Nature preserve, which contains a lake, is located about 1.75 miles southwest of this facility.

According to Mariana, the laboratories at this facility are mostly focused on automotive paint formulation, color matching (for collision shop paint), development of electric coatings, and durability of the paint formulations. This facility tests automotive paint by spraying the paint onto metal or plastic panels using spray booths. Once the paint has been sprayed, durability of the paint can also be tested at this facility in laboratories. For example, Mariana explained that this facility contains a gravelometer which simulates gravel hitting a car, and they can estimate durability of the paint for that process. This site also provides technical support for paint at other BASF manufacturing facilities. This site has 24 emissions units

listed in the ROP, the majority of which (19 of 24) are cold cleaners. As of 5/2/2022, two cold cleaners have been removed (EU-CLD-CLNR18-thru19-PACE), as the emission unit is now located in an area operated by tenant. According to records provided by the facility, two new cold cleaners were added in June of 2022, located in the red label room (explained below) and the E-coat lab. Both have a volume of 5 gallons, an air/vapor interface surface area of 2 ft², and contain solutions that have a Reid vapor pressure below 0.3 psia. As the opening of the cold cleaner is less than 10 ft², this equipment and process is exempt from obtaining a Permit to Install (PTI) under R 336.1281.

Red Label Room

The first stop on our site walk-through was what Mariana and Jeff referred to as the “red label room.” This is their main chemical storage room. No large barrels of chemicals are stored in the individual labs, so chemicals are decanted into smaller vessels, usually 5-gallon amounts for solvents, in this room. All chemical containers were observed to be closed in this room. This room also contained the largest cold cleaner at this facility (EU-CLDCLNR017-CRC-1456-RLR-1-70GAL-SFTYKLN-2005), which has dimensions of 45 ft x 31 ft x 27 ft and contains 70 gallons of the cold cleaner labeled SM 6562, a proprietary blend of: 50% - 70% acetone (CAS No. 67-64-1), 20% - 30% isopropyl alcohol (CAS No. 67 -63-0), and 10% - 20% 2-Butoxy ethanol (CAS No. 111-76-2). Mariana explained that this is the most commonly used chemical blend for their cold cleaner, but they also sometimes use a proprietary blend labeled SM 6565. Jeff provided the SDS sheets for the chemicals used in both blends electronically (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\FG-COLD-CLEANERS). This facility does not use halogenated HAP solvents (>5%w: methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1, 1, 1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5), and chloroform (CAS No. 67-66-3)) in their cold cleaners and is therefore not subject to 40 CFR, Part 63, Subpart T. This cold cleaner is mainly used for washing parts of the spray booths and has a lid with a pneumatic arm. The lid of the cold cleaner was closed, and the instructions were conspicuously posted in compliance with R 336.1707.

Hazardous Waste Room

Next, Mariana and Jeff showed us the hazardous waste room on site. Mariana explained that each lab has their own satellite hazardous waste that is stored in sealable large metal barrels. When these barrels are full in a lab, the barrel is placed on a dolly and transferred to this room. There are also barrels in this room that solvents can be decanted into if needed. Mariana explained that solid waste from the labs is also stored in barrels if it is hazardous. All hazardous waste containers in this room were observed to be closed.

Pigment Room (EU-PIGMENT)

We visited the pigment room at this facility next. Mariana and Jeff explained that the pigment room is rarely used recently, but every time the room is used it is documented. When we entered the room, the HEPA particulate control system was not running. Jeff and Mariana explained that as the pigment room is rarely operated, they keep the system off when it is not in use. The particulate control system contains fabric filter bags and is equipped with a pulse jet. Mariana explained that the filters are changed as needed since the system is not used much. The filters have not yet been changed this year. Jeff turned

the system on so we could observe it. The pressure differential is monitored by a magnahelix pressure sensor. At the time of the inspection, I observed the pressure differential to be ~3" of H₂O.

I observed the record of pigment room use and saw it had only been used twice in 2023 and had not yet been used in 2024. The log keeps track of date and time of room use, the person using the room, the type and amount of pigment removed, and the pressure differential in the room with the particulate control system operating. Mariana explained that once the log page was full, it is scanned and added to their permanent records digitally. This log of the photohelic pressure drop (SC VI.2) as required by MI-ROP-N1336-2020 was provided by the facility (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\EU-PIGMENT). Mariana also explained that the filters are changed when a pressure differential of 5" of H₂O is reached. According to Jeff via email, there has been no maintenance or filter changes on the system for 5 years, likely because it is used so sparingly.

Laboratory Cold Cleaners

After visiting the pigment room, Mariana and Jeff showed us to one of the chemistry labs to observe a cold cleaner in one of the laboratories. The laboratory cold cleaners are two 5-gallon containers right next to each other housed in a flammables chest with a mechanically assisted lid. Mariana explained that there are two containers as one is used for an initial soak and then the second container is used for a secondary soak to ensure the laboratory implements are clean. I observed the cold cleaners to be labeled as their SM 6562 proprietary chemical mix. Mariana explained that all the cold cleaners in the labs (EU-CLDCLNR01thru02-CRC and EU-CLDCLNR03thru16-CRC) are identical in set up, and none of the cold cleaners on site are heated. As the laboratory cold cleaners are identical in set up, only one was observed on this site visit. I observed that lids of the cold cleaners were closed, the lid to the chest containing the 5-gallon containers was closed, and the instructions were conspicuously posted in compliance with R 336.1707. Records that demonstrate compliance with FG-COLD-CLEANERS, SC VI.2 were provided by the facility for all cold cleaners (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\FG-COLD-CLEANERS\SouthfieldColdCleaners_ROP EGLE_2024.pdf).

Paint Booths

After seeing the laboratory cold cleaners, Mariana and Jeff showed us to one of the small spray booths at the facility. There, we met Giuseppe Mandela, Application Equipment Specialist, who had just finished spraying and cleaning out the lines at the spray booth he was working on at the time. Giuseppe explained that all the booths on the first floor were down draft booths and that the spray booths on the second and third floors had drafts blowing from one side of the room to the other. Giuseppe explained all the booths are temperature and humidity controlled for research and development purposes and are also equipped with a sensor system to detect flammables and a sprinkler system in case of fire. Giuseppe stated that air is filtered as it enters the booth to minimize dust and as the air exists the booth, it is filtered four times before it is exhausted to the atmosphere. The first filter stages are inside the booth and, according to Giuseppe, are changed as needed, which is usually once a week or two depending on how much spraying has occurred. The other filters down stream of the initial filter are also changed on the same timescale

according to Guiseppe. According to Guiseppe, each spray booth also has its own spray log. The facility provided a list of active and inactive spray booths at my request (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\Southfield Spraybooths.pdf). As these spray booths are only used for research and development, they are not included as emissions units in MI-ROP-N1336-2020 and are exempt from obtaining a PTI per R 336.1283(2)(b).

Boiler and Generator Room

Mariana and Jeff then showed us to the boiler and generator room. I observed two identical natural gas fired boilers (EU-BOILER1 and 2) with nameplate heat input capacities of 25.1 MMBTU/hr (Cleaver Brooks Model CS-700-600). These boilers have heat inputs larger than 10 MMBTU/hour, so they are subject to 40 CFR Part 60 Subpart Dc. Records that demonstrate compliance with to 40 CFR Part 60 Subpart Dc will be discussed later in the report.

There was also a newer, smaller boiler present, with nameplate heat input of 3.266 MMBTU/hr. This boiler was installed in December of 2022, and Mariana explained it is supposed to be running primarily in the summer to reduce fuel costs. This is also expected to reduce air emissions since both large boilers will not have to run all the time. EGLE-AQD was notified of this change and this emission unit will be included in the flexible group FG-FG-BOILER-MACT5D-SML-MJR-NEW when the ROP is renewed next. Another natural gas fired boiler was present in the PACE building, a different building that is primarily occupied by tenants. This boiler had a heat input of 0.984 MMBTU/hr. This boiler was not observed during this inspection as it was decommissioned in 2020. Maintenance records for this boiler from 2019 until it was decommissioned were provided by the facility (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\FG-BOILER-MACT5D-SML-MJR-NEW). These two boilers do not have heat inputs larger than 10 MMBTU/hour, so they are not subject to 40 CFR Part 60 Subpart Dc.

No boilers at this facility have an oxygen trim system, and all boilers exclusively run on natural gas. All boilers at this site are subject to 40 CFR Part 63, Subpart DDDDD (Boiler MACT). Records that demonstrate compliance with to 40 CFR Part 63, Subpart DDDDD (Boiler MACT) will be discussed later in the report.

An emergency generator was also observed at this facility. This generator is a diesel compression ignition reciprocating internal combustion engine (CI-RICE) with a nameplate capacity of 275 kW and is subject to 40 CFR Part 63, Subparts A and ZZZZ. Records that demonstrate compliance with to 40 CFR Part 63, Subparts A and ZZZZ will be discussed later in the report. This engine was equipped with a non-resettable hour meter, and total run hours observed for this engine was 970.5 hours at the time of inspection. Mariana and Jeff explained that the engine runs every week for about 15 minutes. A log is kept of how long the engine runs and if the engine ever runs in the event of a power failure that is also noted. Jeff sent this log digitally in the records request (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\EU-EMERGENCY-GENERATOR-1\Sfld_Generator Log 2019-2023.pdf). This generator was manufactured before 2006, and is not subject to 40 CFR Part 60, Subpart IIII per 40 CFR 60.4200(a)(2)(i).

Emission Limits

EU-PIGMENT

The following emission limits are described in MI-ROP-N1336-2020 for EU-PIGMENT:

Pollutant	Limit	Time Period/Operating Scenario
Particulate matter (PM) - filterable	0.10 lbs per 1,000 lbs of exhaust gases	1-hour averaging period

The monitoring and testing methods required by EU-PIGMENT SC III.1 (HEPA filter particulate control system is installed and operating correctly, photohelic pressure drop monitored while the room is in use) and SC VI.1-2 (maintenance and filter replacement records kept, record of a photohelic pressure drop kept while room was in use) were met and the appropriate records were provided by the facility (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\EU-PIGMENT). Therefore, the filterable particulate matter emissions are under the emission limits set forth in MI-ROP-N1336-2020, therefore, BASF is in compliance with the emission limits in MI-ROP-N1336-2020.

FG-BOILERS (EU-BOILER1 And EU-BOILER2)

The following recordkeeping requirements are described in MI-ROP-N1336-2020 for FG-BOILERS to be in compliance with 40 CFR Part 60 Subpart Dc:

- Fuel (natural gas) usage by FG-BOILERS (two boilers combined, as allowed by the revised NSPS Dc regulations) in standard cubic feet (or million BTU)
- steam production (per boiler and total) in pounds (with steam temperature and pressure)
- hours of operation (per boiler and total)
per calendar month and per year, based upon 12-month rolling time period, as determined at the end of each calendar month. (SC VI.2)
- Fuel (natural gas) usage by the whole facility in standard cubic feet (or million BTU) (40 CFR Part 60 Subpart Dc).

The records containing the above information for the last 5 years were provided by the facility for FG-BOILERS (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\FG-BOILERS). Jeff indicated via email that the boilers do produce steam, but they are not equipped with a flowmeter to measure total steam production, but the system runs at a pressure of 55 lbs. A summary of natural gas usage and hours of operation of the combined boilers from 2019 – May 2024 is below:

12-month rolling total of combined natural gas usage for EU-BOILER1 and 2 (MCF)						
	Year					
	2019	2020	2021	2022	2023	2024
Jan	N/A	44,391	39,625	39,136	38,641	40,993
Feb	N/A	44,138	39,903	38,995	37,604	39,852
Mar	N/A	42,374	40,646	38,949	38,328	35,621
Apr	N/A	41,820	40,548	39,027	38,292	33,468

May	46,857	41,534	40,224	39,000	38,753	32,748
Jun	46,630	41,727	40,175	38,927	38,571	N/A
Jul	46,682	41,186	40,317	38,867	38,260	N/A
Aug	46,531	41,120	40,008	39,103	37,873	N/A
Sep	46,668	41,018	40,084	38,987	38,081	N/A
Oct	45,937	41,161	39,240	39,507	39,523	N/A
Nov	45,269	40,086	40,042	39,098	39,708	N/A
Dec	46,015	39,304	39,783	39,605	41,120	N/A

The 12-month rolling totals of combined natural gas usage for FG-BOILERS were calculated using the annual natural gas utilization factor provided by the facility and the total natural gas usage for the facility. The natural gas utilization factors for the last five years are as follows:

Year	Utilization Factor
2019	86%
2020	85%
2021	87%
2022	83%
2023	83%

The natural gas usage for 2024 was assumed to be 83% as the annual natural gas utilization factor could not be calculated yet.

12-month rolling total of combined (EU-BOILER1 and 2) usage (hours)						
	Year					
	2019	2020	2021	2022	2023	2024
Jan	8789	8760	8924	9144	8688	7632
Feb	8791	8784	8996	9048	8688	7656
Mar	8791	8784	9092	8952	8688	7656
Apr	8791	8784	9113	8928	8688	7368
May	8791	8784	9212	8832	8688	6984
Jun	8791	8784	9308	8736	8424	N/A
Jul	8800	8784	9308	8736	8448	N/A
Aug	8800	8784	9308	8739	8376	N/A
Sep	8800	8756	9336	8760	8184	N/A
Oct	8800	8756	9312	8784	7872	N/A
Nov	8800	8756	9312	8784	7776	N/A
Dec	8800	8756	9312	8760	7584	N/A

A summary of natural gas usage for the whole facility from 2019 – May 2024 is below:

Monthly facility wide natural gas usage (MCF)						
	Year					
	2019	2020	2021	2022	2023	2024
Jan	8827	7020	7472	8695	7025	5481
Feb	6943	6727	8471	8946	7554	4431
Mar	6429	4429	6186	6659	6933	1150
Apr	4321	3721	4261	4555	4383	1150
May	3100	2799	2711	2822	3335	2131
Jun	2151	2404	2464	2439	2109	N/A
Jul	2383	1775	1964	1967	1544	N/A
Aug	2267	2215	1880	2291	1730	N/A
Sep	2366	2274	2416	2543	2618	N/A
Oct	3286	3493	2865	3747	5363	N/A
Nov	5175	3971	6005	5603	5343	N/A
Dec	6258	5412	6386	7351	8780	N/A

12-month rolling total facility wide natural gas usage (MCF)						
	Year					
	2019	2020	2021	2022	2023	2024
Jan	N/A	51,699	46,448	45,296	46,555	49,389
Feb	N/A	51,483	46,612	45,459	45,306	48,015
Mar	N/A	49,483	47,365	45,653	46,178	42,917
Apr	N/A	48,883	47,167	45,917	46,135	40,323
May	54,777	48,582	46,730	45,998	46,690	39,456
Jun	54,485	48,835	46,618	46,021	46,471	N/A
Jul	54,518	48,227	46,741	46,040	46,096	N/A
Aug	54,314	48,175	46,334	46,411	45,630	N/A
Sep	54,447	48,083	46,369	46,383	45,881	N/A
Oct	53,548	48,290	45,319	47,127	47,618	N/A
Nov	52,702	47,086	46,150	46,866	47,841	N/A
Dec	53,506	46,240	45,728	47,717	49,542	N/A

As these records were provided, BASF is in compliance with 40 CFR Part 60 Subpart Dc for FG-BOILERS and MI-ROP-N1336-2020.

The following recordkeeping requirements are described in MI-ROP-N1336-2020 for FG-BOILERS to be in compliance with MI-ROP-N1336-2020 and 40 CFR Part 63, Subpart DDDDD (Boiler MACT):

An annual tune-up report containing the information listed below: a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater.

- b. A description of any corrective actions taken as a part of the tune-up.
- c. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. (SC VI.3)

These annual tune-up records containing the above information for the last 5 years were provided by the facility for FG-BOILERS (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\FG-BOILERS). According to Jeff via email, these boilers run on natural gas and can only run on 1 type of fuel. The annual tune-ups for the boilers occurred on the following dates:

EU-BOILER1	EU-BOILER2
11/13/2019	11/13/2019
11/23/2020	11/23/2020
10/29/2021	12/21/2021
12/21/2022	12/21/2022
12/5/2023	12/5/2023

Annual tune ups are required no more than 13 months after the previous tune-up (SC III.1). According to Jeff Ammonite via e-mail on 7/30/2024, EU-BOILER1 needed some repairs and was taken out of service for those repairs on 9/26/2022 and was placed back in service 12/11/2022. As the boiler was not operating on 11/29/2022 and the tune-up was conducted within 30 calendar days of start-up, the facility is in compliance per SC III.2 even though the tune-ups are more than 13 months apart. As these records were provided and annual tune-ups have occurred for both boilers every year for the last 5 years, BASF is in compliance with 40 CFR Part 63, Subpart DDDDD (Boiler MACT) and MI-ROP-N1336-2020 for FG-BOILERS.

FG-BOILER-MACT5D-SML-MJR-NEW

The following recordkeeping requirements are described in MI-ROP-N1336-2020 for FG-BOILER-MACT5D-SML-MJR-NEW to be in compliance with 40 CFR Part 63, Subpart DDDDD (Boiler MACT):

A five year tune-up report containing the information listed below:

- a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater.
- b. A description of any corrective actions taken as a part of the tune-up.
- c. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. (SC VI.3)

These 5-year tune ups are required no more than 61 months after the previous tune-up (SC III.1). If a boiler is not operated on the required date of tune up, they must conduct the tune up within 30 calendar days of start-up (SC III.2).

These tune-up records containing the above information for the last 5 years were provided by the facility for boilers previously placed in FG-BOILER-MACT5D-SML-MJR-NEW and for the recently installed boiler which will be placed in this flexible group during the next ROP

renewal (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\FG-BOILER-MACT5D-SML-MJR-NEW). As these records were provided, and the 5-year tune ups were done within the required 61 months, BASF is in compliance with 40 CFR Part 63, Subpart DDDDD (Boiler MACT) for FG-BOILER-MACT5D-SML-MJR-NEW and MI-ROP-N1336-2020.

FG-CI-RICE-MACT4Z

FG-CI-RICE-MACT4Z only includes EU-EMERGENCY-GENERATOR-1. The following recordkeeping requirements are described in MI-ROP-N1336-2020 for FG-CI-RICE-MACT4Z to be in compliance with 40 CFR Part 63, Subparts A and ZZZZ:

1. Records to demonstrate continuous compliance with the operating limitations which include:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (SC VI.3)
2. Records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. (SC VI.4)
3. Records of the total hours of operation for FG-CI-RICE-MACT4Z per calendar year, recorded through the non-resettable hours meter.

All of these records were provided by the facility for FG-CI-RICE-MACT4Z (S:\Air Quality Division\STAFF\Jillian Cellini\Inspection Documents\BASF 2024\EU-EMERGENCY-GENERATOR-1). According to Jeff via email, no malfunctions of this engine were identified in the last 5 years. This engine did not operate more than the allotted 100 hours for maintenance and testing per 40 CFR 63.6640(f)(2). Oil and filter changes as well as hoses and belt inspections for this engine occurred on the following dates: 4/25/2019, 7/7/2020, 11/5/2021, 11/4/2022, and 2/7/2024. There was no maintenance record provided for 2023. BASF reported this deviation on 3/15/2024 on their semi-annual certification report received by EGLE-AQD. As there was one year where annual maintenance did not occur, this is a non-compliance of 40 CFR Part 63, Subparts A and ZZZZ for FG-CI-RICE-MACT4Z and MI-ROP-N1336-2020 ((FG-CI-RICE-MACT4Z, SC III.1 and SC VI.3). However, the unit was serviced in early February 2024. At AQD discretion, no violation notice was issued for this non-compliance.

Reporting

All semi-annual and annual reports required by Source-wide SC VII.4 and Section VII for each Emission Unit and Flexible Group were received on time for the last five years except for reports submitted on 3/18/2021 (annual and semi-annual), 9/23/2021 (semi-annual), 3/18/2022 (annual and semi-annual), and 4/15/2024 (annual). These annual and semi-annual reports required by the ROP are due on 3/15 and 9/15 of every year. They include all reporting required by the ROP, including the reporting required for 40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6650(f)). Annual compliance reports required by 40 CFR 63 Subpart DDDDD (Boiler MACT) required by FG-NG-BOILER-MACT5D have been

submitted separately and on time for the past 5 years. As some of these reports are late, this is non-compliance of 40 CFR Part 63, ZZZZ and MI-ROP-N1336-2020. However, all semi-annual and annual reports were eventually submitted, and none were over a month late. At AQD discretion, no violation notice was issued for this non-compliance.

2023 Emission Report

This facility submitted their annual emissions report form on time to MiEnviro for the 2023 calendar year. The Criteria Air Pollutant emissions are as follows:

Pollutant	Total Emissions (tons)
CO	1.655
Pb	0.00001
NO _x	2.757
PM ₁₀	0.1615
PM _{2.5}	0.1582
SO ₂	0.01202
VOCs	2.4982
NH ₃	0.0621

Conclusion

This facility is non-compliant with ROP-N1336-2020 (FG-CI-RICE-MACT4Z, SC III.1 and SC VI.3) and 40 CFR Part 63, Subparts A and ZZZZ as there was one year (2023) out of the last 5 years when annual maintenance did not occur. However, the unit was serviced in early February 2024. At AQD discretion, no violation notice was issued for this non-compliance.

All semi-annual and annual reports required by Source-wide SC VII.4 and Section VII for each Emission Unit and Flexible Group were received on time for the last five years except for reports submitted on 3/18/2021 (annual and semi-annual), 9/23/2021 (semi-annual), 3/18/2022 (annual and semi-annual), and 4/15/2024 (annual). These annual and semi-annual reports required by the ROP are due on 3/15 and 9/15 of every year. As some of these reports are late, this is non-compliance of 40 CFR Part 63, ZZZZ and MI-ROP-N1336-2020. However, all semi-annual and annual reports were eventually submitted, and none were over a month late. At AQD discretion, no violation notice was issued for this non-compliance.

Observations made during the inspection and record review indicate that of BASF Corporation – BASF Automotive R & D Campus located at 26701 Telegraph Road, in Southfield, MI is operating in compliance with all other 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); Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules, and MI-ROP-N1336-2020.

NAME Jillian Cellina

DATE 8/7/2024 SUPERVISOR

K. Kelly