



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

September 22, 2020

VIA EMAIL: jerry.lebold@basf.com

Mr. Jerry Lebold
BASF Corporation – Geismar Site
P.O. Box 457
Geismar, Louisiana 70734

RE: Emission Inventory Permit Consistency Review
BASF Corporation – Geismar Site (AI# 2049)

Dear Mr. Lebold:

The U.S. Environmental Protection Agency (EPA) Region 6 is working with the Louisiana Department of Environmental Quality (LDEQ) and has reviewed your facility's 2018 emission inventory for criteria pollutant and hazardous air pollutant (HAP) emission totals, as reported to LDEQ. Based upon this review, EPA has determined that your reported emissions for some Emission Points exceeded your permit authorization limits. EPA had also reviewed your Title V reports for 2018 and did not find that these permit exceedances were reported.

A detail by Emission Point of the differences between the reported emissions and permitted limits is included in the attachment to this letter. EPA is providing you the opportunity to clarify or explain these differences, especially if any of the following conditions are present:

- Sources and associated emissions included in the emission inventories that are not represented in permits (e.g. de minimis sources);
- Criteria pollutants or individual HAPs reported in the facility's emission inventories that are not represented in LDEQ permits or authorizations;
- Reported or unreported upset or other excess emission events (e.g. startup/shutdown).

If BASF Corporation (BASF) is interested in discussing or providing information about this matter, you have ten (10) working days from receipt of this letter to inform EPA by e-mail by contacting:

Kevin Kim
Enforcement Officer (ECDAT)
Air Toxics Enforcement Section
U.S. EPA, Region 6
email: kim.kevin@epa.gov

Subsequent to the above-referenced due date, Kevin Kim will arrange to meet with BASF via conference call. At that time, BASF may provide additional information to address the potential

violations and present evidence that contravenes EPA's evidence. The primary goal is to ensure compliance with the applicable environmental laws and regulations; however, settlements will be available where appropriate.

Please direct questions to Kevin Kim of the Air Enforcement Branch at 214-665-8554 or at kim.kevin@epa.gov. Thank you for your attention to this matter.

The EPA acknowledges that the COVID-19 pandemic may impact your business. If that is the case, please contact us regarding any specific issues you need to discuss.

Sincerely,

STEVEN
THOMPSON

 Digitally signed by STEVEN THOMPSON
DN: c=US, o=U.S. Government, ou=Environmental
Protection Agency, cn=STEVEN THOMPSON,
0.9.2342.19200300.100.1.1=68001003652657
Date: 2020.09.21 13:47:11 -05'00'

Steve Thompson
Chief
Air Enforcement Branch

Attachment

ECC: Celena Cage, Louisiana Department of Environmental Quality, celena.cage@la.gov

Attachment A**BASF Corp - Geismar**

AI #	Facility Name	Permit	Subject Item	Subject Item Type	Subject Item Desc	Emission Type	Parameter Desc	Permitted Limit (tpy)	ERIC Reported Emissions (tpy)	Reported Emissions Over Permitted Limit (tpy)
2049	BASF Corp - Geismar Site	2559-V7	EQT00000000868	Internal combustion engine	MDI03 - MDI-2 Emergency Diesel Generator	Routine	Nitrogen oxides	1.08	3.49	2.41