



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

**DATE:** JUN 21 2019

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
BASF Corporation, Cincinnati, Ohio

**FROM:** Gina Harrison, Environmental Scientist  
AECAB (MN/OH)

**THRU:** Dakota Prentice, Acting Section Chief  
AECAB (MN/OH)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** BASF Corporation

**Facility Location:** 4900 Este Avenue, Cincinnati, Ohio 45232

**Date of Inspection:** April 23, 2019

**Lead Inspector(s):**

1. Gina Harrison, Environmental Scientist
2. Patrick Miller, Environmental Engineer

**Other Attendees**

1. Rose Wilson, Senior EHS Specialist, BASF
2. Michael A McFarland, Operations Manager, Cincinnati Plant, BASF
3. Jason Phillips, APG Supervisor, BASF

**Contact email address:** [rose.wilson@basf.com](mailto:rose.wilson@basf.com)

**Purpose of Inspection:** Determine compliance with the facility's Title V permit and the Ohio State Implementation Plan (Ohio SIP). Also, evaluate potential NSPS and/or NESHAP applicability.

**Facility Type:** Chemical production plant

**Regulations Central to Inspection:** Ohio Title V Permit P0122976, Miscellaneous Organic Chemical Manufacturing NESHAP at 40 C.F.R. Part 63, Subpart FFFF (MON), NESHAP for

Organiz Hazardous Air Pollutants for Equipment Leaks at 40 C.F.R. Part 63, Subpart H, the NESHAP General Provisions Subpart A general duty requirements, and the Ohio SIP.

**Arrival Time:** 9:08 AM EDT

**Departure Time:** 3:25 PM EDT

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Michael McFarland or Rose Wilson.

**Company Ownership:** The facility has been operating at this location since it started up in 1840 and operated as Emery Candle Company - a candlemaker - until it was sold in 1978 to Quantum, Inc. In 1989 the facility was sold to Henkel, then part of the company was sold again in 1999 to Cognis Corporation. Cognis Corporation bought remaining interests from Henkel in 2001. In 2008, the company renamed itself Cognis Oleo, and in 2010 Cognis Oleo sold the facility to BASF. In 2011, BASF sold part of the company to Emery Oleochemicals, and the facility is still operating in this structure under two separate companies at the same location. BASF corporate headquarters is located in Ludwigshafen, Germany, and its U.S. headquarters is located in Florian Park, New Jersey.

**Process Description, Staff Interview, Tour Information and Records Review sections of this report contain CBI and are included as a separate CBI attachment (Attachment A).**

**CLOSING CONFERENCE**

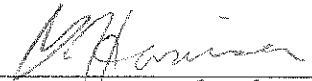
Ms. Harrison and Mr. Miller thanked Ms. Wilson and Mr. McFarland for their time and told them we would send a copy of the inspection report by email when it was completed. We confirmed that the report will contain Confidential Business Information and will be treated as such. Ms. Harrison stated that EPA may issue a Section 114 Information Request or follow up with questions via phone or email if further questions or concerns arise.

**Compliance Assistance:** General compliance assistance was provided by discussing potential applicability of the MON, the NESHAP for Organic Hazardous Air Pollutants for Equipment Leaks Subpart H, and the NESHAP General Provisions Subpart A general duty requirements.

**Concerns:** Inspectors discussed the emissions observed from the methanol reclaimer and stock tanks' conservation vents and noted this may be an area of concern. Apart from discussing

potentially applicable MON requirements no additional concerns were shared with the facility at the time of the inspection.

SIGNATURES

Report Author:  Date: 6/21/19

Section Chief:  Date: 6/21/19