



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/05/2024	
Media Program:	Air	
Regulatory Program(s)	Title V, NESHAP	
Company Name:	BASF Corporation	
Facility Name:	BASF Beaumont Agro Plant	
Facility Physical Location:	Latitude 29° 58' 17" Longitude 94° 3' 12"	
(city, state, zip code)	Beaumont, TX 77705	
Mailing address:	14385 W Port Arthur Rd	
(city, state, zip code)	Beaumont, TX 77705	
County/Parish:	Jefferson County	
Facility Phone Number	409-981-5050	
Facility Contact:	Caitlin Wilding	Environmental Health & Safety Manager
	Caitlin.wilding@basf.com	
FRS Number:	110000464239	
Identification/Permit Number:	RN100634922, CN600124895	
Media Identifier Number:	48-245-00008	
NAICS:	325199	
SIC:	2879	
Personnel participating in inspection:		
Justin Chen	EPA Region 6 ECDAT	Environmental Engineer
Benjamin Donaldson	EPA Region 6 ECDAT	Environmental Engineer
Kenneth McPherson	EPA Region 6 ECDAT	Life Scientist
Sarah Frey	EPA Region 6 ECDAT	Physical Scientist
Colleen McCarthy	EPA Region 6 ECDAT	Life Scientist
Daniel Hoyt	EPA OECA AED	Environmental Engineer
Nathaniel Hicks	EPA OECA AED	Physical Scientist
Richard Helmich	EPA NEIC	Chemist
Philip Myers	EPA NEIC	Mechanical Engineer
Caitlin Wilder	BASF	Environmental Health & Safety Manager
Alexis Fischer	BASF	Compliance Analyst
EPA Lead Inspector Signature/Date	NATHANIEL HICKS Digitally signed by NATHANIEL HICKS Date: 2024.04.03 16:24:12 -06'00'	
	Nathaniel Hicks	Date
Supervisor Signature/Date	GREGORY FRIED Digitally signed by GREGORY FRIED Date: 2024.04.04 14:15:32 -04'00'	
	Gregory Fried	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA inspectors Daniel Hoyt (Headquarters), Nathan Hicks (Headquarters), Justin Chen (Region 6), Benjamin Donaldson (Region 6), and Kenneth McPherson (Region 6) accompanied by Philip Myers and Richard Helmich (National Enforcement Investigations Center, “NEIC”) arrived at the BASF Corporation’s BASF Beaumont Agro Plant (“Facility”) at 1315 on February 5, 2024, for an unannounced inspection. We met with Caitlin Wilder/EHS Manager and Alexis Fischer/Compliance Analyst. Credentials were presented to Ms. Wilder and informed them that this was an EPA inspection to evaluate potential sources of excess emissions using EPA’s Geospatial Measurement of Air Pollution (“GMAP”) vehicle and evaluate compliance with the Facility’s Title V Air Permit and the Clean Air Act. The scope of the inspection is a partial evaluation (“PCE”). This inspection occurred as part of a multi-scale monitoring project in the Beaumont-Port Arthur area. Photographs taken during the inspection can be found in Appendix 1.

FACILITY DESCRIPTION

The Facility is a pesticide active ingredients manufacturing facility. The plant includes the Dicamba Unit, the dimethenamid (“DMTA”) Unit, Multi-Purpose Plant (“MPP”), a hazardous waste incinerator, a wastewater treatment area, and a pilot plant which operates periodically during the year. The MPP and hazardous waste incinerator have not operated since 2003. The Facility operates under New Source Review (“NSR”) Permit 20057 amended March 9, 2023 and NSR Permit 978B revised March 22, 2022. Federal Operating Permit O-3955, issued June 26, 2019, is listed as “VOID” in Texas Commission on Environmental Quality Central Registry.

Section II - OBSERVATIONS

The NEIC GMAP was driven by Philip Myers and Richard Helmich and the instruments were operated by Mr. Myers. A BASF Security Officer was present and accompanied the GMAP during its survey. Conditions were sunny and windy, with the wind blowing primarily in the southwest direction. The EPA Inspectors followed the GMAP in a secondary vehicle. The GMAP drove on all available facility roads measuring air pollutant concentrations downwind of each of the process areas, if possible. A full report from the GMAP will be issued by NEIC at a later date.

Nathaniel Hicks and Daniel Hoyt operated a Data Acquisition in Real Time (“DART”) unit on their vehicle, equipped with a photoionization detector (“PID”) that measures volatile organic compounds (“VOC”) in the air, and a wind monitor that monitors wind speed, wind direction and geolocation. The DART unit had a 10.6ev PID installed.

The site GMAP survey ended at 1515 and we returned to the conference room. No significant levels of ambient air pollution were detected.

Region 6 Follow-up Inspection

At 1600 on February 12, 2024, EPA Region 6 inspectors Sarah Frey, Colleen McCarthy, and Ken McPherson conducted a follow-up inspection. We met with Caitlin Wilder, presented credentials, and informed her that we wished to inspect Tank WB-501.

On November 8, 2023, EPA conducted an infrared aerial survey which detected hydrocarbons emitting from the Facility's Wastewater Storage Tank WB-501. The facility was notified of the observation on December 1, 2023. On December 15, 2023, the Facility provided information of actions taken at Tank WB-501, including ultrasonic ear and Leak Detection and Repair monitoring. The Facility stated that no unauthorized emissions were detected on December 4 and 5, 2023.

We entered the field at 1620 and acquired a Safe Work Permit. We were accompanied by Ms. Wilder and two Facility employees.

Using an optical gas imaging camera, we observed Tank WB-501 to be full. The Facility stated that the tank has no active pumping and is currently isolated. The Facility is in the process of constructing a thermal oxidizer, which will control vapors from the wastewater tanks. Currently, the vapors are routed to a scrubber.

Ms. McCarthy and Mr. McPherson climbed Tank WB-501 with Ms. Wilder. EPA's photoionization detector measured VOCs up to 10 parts per million. Inspectors observed piping and components that had recently been repaired. They also observed visual defects and gaps at flange gaskets along feed lines to the tank (see Photo 1 in Appendix 1.) No hydrocarbons were detected using the optical gas imaging camera.

The inspection team departed the facility at 1730.

Section III – AREAS OF CONCERN

EPA conducted a closing conference at BASF Corporation Beaumont Agro Plant at 1518 on February 5, 2024, for the initial inspection. Mr. Meyers and Mr. Hoyt summarized the facility tour and presented their emissions observations to Facility representatives Caitlin Wilder and Alexis Fischer. We observed no areas of concern at the time of inspection. The Facility made no claims of confidential business information ("CBI"). We departed the Facility at 1530.

EPA conducted a closing conference at BASF Agro Plant at 1720 on February 12, 2024, for the follow-up inspection. Ms. McCarthy presented observations to Ms. Wilder. We observed no areas of concern at the time of inspection. One photo was taken, and no claims of CBI were made.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on February 12, 2024.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 1 photos taken 2/12/2024

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: BASF Beaumont Agro Plant		
City: Beaumont	County: Jefferson	State: TX



Photo File Name: DC_0376.jpg

Date of Photo: 02/12/2024

Time of Photo: 1705

Photographer: Colleen McCarthy

Description: Tank WB-501 feed lines observed with visual defects and gaps at flange gaskets.