



**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**7012 2920 0001 0585 2132**

July 21, 2016

Mr. Todd Zynda  
Michigan Department of Environmental Quality - Air Quality Division  
Cadillac Place  
3058 West Grand Boulevard, Suite 2-300  
Detroit, Michigan 48202-6058

Re: Response to MDEQ-AQD - Violation Notice of SC V.1 of PTI 113-07A - dated July 1<sup>st</sup>, 2016  
**BASF Corporation, Wyandotte, MI**

Dear Mr. Zynda:

The purpose of this letter is to respond to the Violation Notice issued by the Air Quality Division (AQD) on July 1, 2016 and received by BASF (via email attachment) on July 5, 2016. In our face to face meeting on 07/08/16 we acknowledged that the change to the stack testing requirement in Permit-to-Install (PTI) 113-07A, issued September 14, 2015, was missed and that we will submit a compliance plan to perform the required stack testing. In our defense, and as we advised, our only intent in modifying the permit was to correct via removal, requirements specific to NSPS DDD. We viewed the permit application as an administrative permit change with no changes to equipment, operating parameters or emission rates and expected that the only changes to the original permit (113-07) would be the removal of these special conditions. At no time (other than a footnote in the initial draft PTI) was there direct communication regarding the need or intent on AQD's part to change the stack testing requirements to recurring (testing every 5 years). Having been made aware of the provision, we construe the original stack testing performed in 2010 to have fulfilled the requirement to perform stack testing within 180 days of permit issuance (or startup) - since there has been no change to the process or operating parameters under which the original stack testing was performed and that the issuance of 113-07A was not a reissuance of all permit requirements - those already fulfilled under the original permit conditions (i.e. installation, startup notification under Subpart A & Kb, etc.).



We create chemistry

Notwithstanding, BASF proposes the following remedy to address the alleged violation:

1. BASF will submit a stack testing plan to verify and quantify the ethyl acrylate emission rate and TOC destruction efficiency from FG-RTO to the AQD for approval by August 19th, 2016.
2. Upon approval, BASF will contract a qualified stack testing contractor to perform the stack test per the approved plan.
3. BASF will submit the stack testing report within 60 days of the completion (last day) of the stack test.

If you have any questions or concerns or need further information please contact me at (734) 324-6102.

Best Regards,

A handwritten signature in blue ink, appearing to read "Jordan Thompson".

Jordan Thompson  
EHS Specialist