



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

June 17, 2014

Mr. Greg Pflum, Vice President
BASF Corporation
1609 Biddle Avenue
Wyandotte, Michigan 48192

SRN: M4777, Wayne County

Dear Mr. Pflum:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division (AQD) has not received an application for renewal of Renewable Operating Permit (ROP) No. MI-ROP-M4777-2009 for BASF Corporation's Plastic Plants (BASF) located at 1609 Biddle Avenue, Wyandotte, Michigan. In accordance with Rule 210(7) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), an administratively complete application for renewal of a ROP is considered timely if it is received by the DEQ not more than 18 months, but not less than 6 months, before the expiration date of the current ROP. The deadline for submitting the application was June 10, 2014.

Failure to submit a timely application constitutes a violation of Rule 210(1) of Act 451 which requires that a source not operate any emission units at a source required to obtain a ROP unless a timely and administratively complete application has been received by the DEQ. As a result of the failure to submit a timely and administratively complete application in accordance with the requirements of Rule 210(7) of Act 451, this facility has failed to obtain an "application shield."

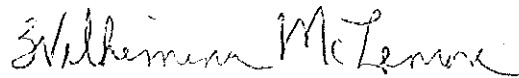
Furthermore, on December 10, 2014, BASF's ROP will expire. In accordance with Rule 217(1)(c) of Act 451, the source will lose its "permit shield" upon expiration of the ROP. In addition, according to Section 5506(2) of Act 451, the expiration of an operating permit terminates the person's right to operate a source. Therefore, if the ROP renewal is not issued by December 10, 2014, and this source continues to operate after this date, BASF is in violation of Section 5506(2) of Act 451.

Please submit a complete application within 60 days from the date of this letter.

If BASF believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact Jeff Korniski at 313-456-4681 or korniskij@michigan.gov, or you may contact me at the number listed below.

Sincerely,



Wilhemina McLemore
Detroit District Supervisor
Air Quality Division
313-456-4685

WM:JS

cc via email: Mr. Bryan Hughes, EHS Team Leader, BASF Corporation
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Jeff Korniski, DEQ