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August 22, 2017

Todd Zynda, Environmental Engineer
Michigan DEQ - Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202-6058

**Re: BASF Corporation, Wyandotte, MI: B4359 – Steam Plant Violation Notice
Response**

Dear Mr. Zynda:

In response to MDEQ-AQD's Violation Notice issued July 25th, 2017, BASF Corporation has prepared the following response. We are submitting this today per our August 4, 2017 telephone conversation and your August 14, 2017 email confirming a one week extension to respond.

As discussed over the phone with you on 7/24/17, while the current water feed system lacks a true physical limitation to limit water feed to the boilers to less than 240 gpm (due to redundant backup RO filters and feed pumps), BASF could install a compliant physical restriction (flow restriction device or orifice plate) on the feedwater system to comply with the Rule 278(a) analysis. Since startup our maximum hourly feed rate has been ~109,000 lbs./hr. steam on 2/9/17, well short of the 120,000 lb./hr. or 240 gpm maximum water feed rate assumed in the 278(a) Potential to Emit (PTE) analysis.

While a flow restrictor plate could provide the required physical limit on boiler water feed rate for the near term, BASF's recent acquisition of Concep Technologies and future plans for this facility will increase steam demand during the next peak heating season. We anticipate that we may need to exceed the 120,000 lb./hr. water feed rate assumed in our permit exemption demonstration for short periods of time to meet the combination of increased process steam demand due to the acquisition and normal high winter demand. As such, prior to receiving the Violation Notice, BASF proactively initiated plans to address this future demand issue (as well as rectify the current issue of not having a compliant physical restriction), by contracting Barr Engineering to assemble and submit a Permit to Install (PTI) application. We received a proposal from Barr to perform this work on 7/21/17 and issued a Purchase Order to complete the PTI on 8/15/17.



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BASF will submit a PTI package that will demonstrate compliance with all applicable rules for all four boilers operating at their maximum PTE rates. We anticipate submitting this air permit package to the MDEQ- AQD by 10/1/2017.

Thank you for your consideration. Should you have any concerns or questions regarding the information contained in this submittal please contact me at 734-324-6102.

Sincerely,

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

Jordan Thompson
Sr. EHS Specialist

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