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September 3, 2019

Jonathon Lamb  
Senior Environmental Quality Analyst  
Michigan DEQ, Air Quality Division  
3058 W. Grand Blvd., Suite 2-300  
Detroit, Michigan 48202

**RE: August 12, 2019 Violation Notice Concerning Alleged  
Nuisance Odors Detected August 3, 2019**

Dear Mr. Lamb,

Solutia, Inc. ("Solutia") received your August 12, 2019, Violation Notice alleging that from approximately 11:10 to 11:55 PM on August 3, 2019, you detected nuisance odors that you believed were coming from Solutia's Trenton, Michigan facility (the Site). Thank you for bringing this matter to our attention. Solutia is committed to be a good neighbor and notice of such possible offsite impacts is important to meeting that objective.

Upon receipt of your letter on August 13<sup>th</sup>, we immediately began an internal evaluation of possible sources of odors on August 3<sup>rd</sup>. It is our understanding that odors were first observed at approximately 8:00 PM, 1.6 miles away from the plant and you personally detected them from approximately 11:10 PM to 11:55 PM. Given the amount of time that had passed since the date of these alleged offsite odors, our evaluation was limited to the evaluation of electronic data captured for process conditions and control device monitoring during these times.

Our review of site activities during these times on August 3<sup>rd</sup> did not reveal any unusual actions or operating conditions in the plant. All air pollution control equipment parameters (e.g., condensers coolant flowrate and temperature, scrubbers water flowrate, etc.) were monitored and the recorded data indicates Solutia's operations were in compliance with air emission permit requirements. No abnormal odors were reported by Solutia personnel on duty at the time of the alleged offsite odors.

As odors are subjective by nature and affected by everchanging wind and weather conditions, attention to abnormal odors is best managed when the odor is present. As the report was transmitted to Solutia well over a week after the date of the alleged offsite odors, we were limited in our ability to determine if Solutia was the source of these odors and if so, the cause, duration or

to take specific corrective action.

Thank you again, for bringing this issue to our attention. Solutia takes being a good neighbor seriously and wishes to avoid being the source of offsite odors. In the future, please notify a site-wide supervisor via telephone at 734-672-7903 at the time you become aware of any alleged offsite odors that you believe are coming from the Site. This will allow us the opportunity evaluate our site operations at that time and better determine if we are the source, the cause and how to prevent recurrence.

Thank you again for your bringing this matter to our attention. We very much appreciate your notice.

Sincerely,

A handwritten signature in black ink that reads "Charles E. Anderson". The signature is written in a cursive style with a large initial "C".

Charles E. Anderson  
Environmental Specialist

cc: Ms. Jenine Camilleri  
Ms. Jill Zimmerman