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October 19, 2018

VIA EMAIL AND FEDEX

Justin Chen, P.E.
Air Toxics Enforcement Section (6EN-AT)
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Responses to Clean Air Act Section 114 Supplemental Information Request
BASF Corporation
Freeport, Texas Plant

Dear Mr. Chen:

BASF Corporation ("BASF" or the "Company") provides the following attachment in response to the Environmental Protection Agency's ("EPA") Region 6 Clean Air Act Section 114 supplemental request by email dated August 28, 2018 for additional information regarding flaring operations at the Company's Freeport, Texas chemical manufacturing plant. Please note that the accompanying attachment is marked Confidential Business Information ("CBI").

This supplemental response incorporates by reference the Scope of Review and all of the Specific Objections and Interpretative Assumptions for each Individual Request set forth in its correspondence dated July 25, 2016 and renewed in its First and Second Supplemental Responses of September 7, 2016 and November 10, 2016, which apply to each Individual Request and the 114 Request as a whole. In addition, the Company hereby incorporates by reference all CBI claims set forth in its correspondence of July 25, 2016.

We hope this responds to your questions and look forward to our scheduled meeting on October 29, 2018.

Sincerely,

Madeleine Boyer
Counsel for BASF Corporation

Enclosure

cc: Erin Tanimura, Esq., Office of Regional Counsel, Air Enforcement Branch (6RC-EA), U.S. Environmental Protection Agency, Region 6
Linda Mirsky Brenneman, Associate General Counsel, Environmental, BASF Corporation