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December 14, 2018

VIA E-MAIL 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 accompanying attachments in response to the Environmental Protection Agency's ("EPA") Region 6 Clean Air Act Section 114 supplemental request by email dated November 5, 2018 for additional information regarding flaring operations at the Company's Freeport, Texas chemical manufacturing plant. Please note that several of the attachments are 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, Second, and Third Supplemental Responses of September 7, 2016, November 10, 2016, and October 18, 2018, 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.

Sincerely,

Madeleine Boyer
Counsel for BASF Corporation

Enclosures

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