



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

August 17, 2021

TRANSMITTED VIA ELECTRONIC MAIL

Mr. Randolph Roberts, Senior EHS Specialist
BASF Corporation
602 Copper Road
Freeport, Texas 77541-3001

randolph.roberts@basf.com

RE: Request for Voidance of Alternate Monitoring Procedures
R-170 Catalytic Incinerator EPN 11-1-2
Cyclohexanone I and II Plants, Caprolactam Complex
BASF Corporation, Freeport, TX Site
TCEQ Account No. BL-0021-O
NSR Permit 1733A

Dear Mr. Roberts:

EPA Region 6 acknowledges your request to void the previously approved Alternative Monitoring Plan (AMP), originally dated February 24, 2005. BASF Corporation has determined that it can comply with 40 Code of Federal Regulation (CFR) Part 60 Subpart NNN and Subpart III for use of the R-170 Catalytic Incinerator, without the need to employ an AMP. The company summarized its evaluation and determination in email correspondence dated July 16, 2021, which is furnished here for reference.

By this reply, EPA formally voids BASF Corporation's AMP, and we will close this project without further review or action. If the company determines the need for an AMP in the future, a new petition will need to be submitted. EPA will forward a copy of this correspondence to the Texas Commission on Environmental Quality (TCEQ), informing them of the company's decision to void the AMP. A copy of this correspondence also will be kept in our file records for reference.

In this regard, please be advised that EPA Region 6 no longer accepts paper submissions for applicability determinations, regulatory interpretations, or alternative monitoring requests. We have implemented an electronic submission and tracking system for these petitions and requests. You will need to submit the request and supporting documentation electronically for Region 6 to complete review and issue a formal response. The new electronic application, ADAM-CAP (Applicability Determinations, Alternative Monitoring, and Compliance Assistance Projects), is

used to receive petitions and requests, track the progress of review and follow up for additional information, and issue responses.

If you need to submit a request in the future, please contact Diana Lundelius in Air Enforcement for written instructions at 214-665-7468, or lundelius.diana@epa.gov. Questions regarding EPA's response to the request to void the previously approved AMP may be addressed to Justin Chen of my staff at 214-665-2273, or chen.justin@epa.gov.

Sincerely,

STEVEN
THOMPSON

Digitally signed by STEVEN THOMPSON
DN: cn=US, o=U.S. Government,
ou=Environmental Protection Agency,
c=STEVEN THOMPSON,
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Steve Thompson
Chief
Air Enforcement Branch

Enclosure – R-170 Supporting Test Data

cc: Michael De La Cruz, Texas Commission on Environmental Quality,
Michael.delacruz@tceq.texas.gov
Joseph Doby, TCEQ Region 12, joseph.doby@tceq.texas.gov