

Request for Extension of Compliance

SECTION I GENERAL INFORMATION

A. Print or type the following information for each facility for which you are requesting an extension of compliance (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)		Facility I.D. Number (OPTIONAL)	
Permit O2031 and O2030			
Responsible Official's Name/Title			
Fernando Frollini/Site Responsible Care Leader			
Street Address			
7501 Highway 185 North			
City	State	ZIP Code	
Seadrift	Texas	77983	
Facility Name (if different from Responsible Official's Name)			
Seadrift Operations			
Facility Street Address (If different than Responsible Official's Street Address)			
Facility Local Contact Name		Title	Phone (OPTIONAL)
Kyle Lofland		EH&S Delivery Leader	361-553-3399
City	State	ZIP Code	
Seadrift	Texas	77983	

B. Indicate the relevant standard or other requirement that is the basis for this request for this compliance extension request:

Pursuant to 40 CFR 63.6(i)(4)(i) and (ii) of the MACT rule General Provisions our Seadrift Operations site is requesting a one-year extension from the compliance date of July 15, 2026, to July 15, 2027 for physical installation or December 12, 2027 for other requirements, for the following projects and associated regulatory citations:

The scope of these projects has changed from a Thermal Oxidizer Project and Purge Glycol Reactor to two different projects that will involve a vent gas scrubber and a Purge Glycol Reactor system for each CMPU. The Purge Glycol Reactor systems will also treat any process wastewater streams to meet the HON requirements.

Project #1 – One vent scrubber will be installed in our Glycol Ethers Plant to treat process vents in Ethylene Oxide Service from this plant. The liquid from this vent scrubber will be combined with a process wastewater stream from this plant and then treated in a Purge Glycol Reactor.

Project #2 - One vent scrubber will be installed in our Ethanolamines Plant to treat process vents in Ethylene Oxide Service from this plant. The liquid from this vent scrubber will be combined with a process wastewater stream from this plant and then treated in a Purge Glycol Reactor.

Regulatory Citations that apply to both projects are:

40 CFR 63 Subpart G – 40 CFR 63.124 – Process Vents and Storage Vessels that are in ethylene oxide service – procedures to determine compliance.

40 CFR 63.138 – Process wastewater provisions – performance standards for treatment processes managing Group 1 wastewater streams and/or residuals removed from Group 1 wastewater streams; and

40 CFR 63.138(b)(3) – Control options: Group 1 wastewater streams for Table 9 compounds – Reduce, by removal or destruction, the concentration of ethylene oxide to a level less than 1 parts per million by weight as determined in the procedures in §63.145(b) of this subpart; and the following general control provisions for Group 1 process wastewater streams:

40 CFR 63.132 – Process wastewater provisions – general

40 CFR 63.133 – Process wastewater provisions – wastewater tanks

40 CFR 63.134 – Process wastewater provisions – surface impoundments

40 CFR 63.135 – Process wastewater provisions – containers

40 CFR 63.136 – Process wastewater provisions – individual drain systems

40 CFR 63.137 – Process wastewater provisions – oil-water separators

C.

Reasons why additional time is needed

A one-year extension is needed in order to properly engineer and construct the projects. Typically, it takes 36 months to complete projects similar to these. Key steps in the engineering, procurement, and construction process are:

Major Steps in Process	Estimated Time to Complete (Months)
Testing to determine "In EO Service" and Pre-FEED Project Scoping	6
Front End Engineering Design (FEED)	12
Detailed Design Engineering	9
Procurement (Obtaining Vendor Bids, Vendor Questions & Selection, Equipment Fabrication & Delivery to site)	19 (overlaps with engineering)
Construction of Required Equipment, Piping and Instrumentation	10 (overlaps with detailed engineering)
Develop Operating Procedures, Commissioning Equipment, and Placing Into Service	1 – 1.5 months
Total Estimated Time for Project including testing to determine "In EO Service":	36

Note: Some steps like Procurement overlap with Front End Engineering Design, Detailed Design Engineering, and Construction. Construction also overlaps with Detailed Design Engineering.

SECTION II

CERTIFICATION *(Note: you may edit the text in this section as deemed appropriate)*

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this request is accurate and true to the best of my knowledge.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Fernando Frollini	Responsible Care Leader	02/26/2025
Signature of Responsible Official		

Note: Responsible official is defined under §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is owned by the Federal, State, city, or county government; or a ranking military officer if the plant is located on a military installation.

SECTION III COMPLIANCE SCHEDULE INFORMATION

A. Describe the controls that will be installed at your facility to ensure compliance with the relevant standard. (§63.6(i)(6)(i)(A)) – See the descriptions for each project below:

Project #1 – One new Water Scrubber will be installed in our Glycol Ethers Plant to treat process vents in Ethylene Oxide Service from this plant. The liquid from this vent scrubber will be treated in a Purge Glycol Reactor to remove trace amounts of ethylene oxide that may be present. In addition, a process wastewater stream in Ethylene Oxide Service from this plant will also be treated in this same Purge Glycol Reactor.

The goal of the Water Scrubber is to reduce the ethylene oxide concentration to a level of < 1 ppmv prior to discharge to the atmosphere. The goal of the Purge Glycol Reactor is to reduce the ethylene oxide concentration to a level of < 1 ppmw.

Project #2 - One new Water Scrubber will be installed in our Ethanolamines Plant to treat process vents in Ethylene Oxide Service from this plant. The liquid from this vent scrubber will be treated in a Purge Glycol Reactor to remove trace amounts of ethylene oxide that may be present. In addition, a process wastewater stream in Ethylene Oxide Service from this plant will also be treated in this same Purge Glycol Reactor.

The goal of the Water Scrubber is to reduce the ethylene oxide concentration to a level of < 1 ppmv prior to discharge to the atmosphere. The goal of the Purge Glycol Reactor is to reduce the ethylene oxide concentration to a level of < 1 ppmw.

Due to small levels of emissions associated with these sources, the health of persons will be protected from imminent endangerment, as required by 40 CFR §63.6(i)(4)(ii).

B. Describe your compliance schedule by specifying the date by which you will complete each of the following steps toward achieving compliance: (§63.6(i)(6)(i)(B)(1)-(4)):

A compliance schedule, including the date by which each step toward compliance will be reached. At a minimum, the list of dates shall include:

(1) The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated.

On-site construction for both projects is planned to be initiated by August 1, 2026. Dow may initiate some work related to tie points prior to this date to facilitate this project.

(2) The date by which final compliance is to be achieved.

Compliance for both projects is expected to be achieved by July 15, 2027.

(3) The date by which on-site construction, installation of emission control equipment, or a process change is to be completed; and

On-site construction is planned to be completed by June 1, 2027, for both projects.

(4) The date by which final compliance is to be achieved;

Start-up of both systems and compliance is expected to be achieved by July 15, 2027.