

annual steam event). DPE has considered various options, but none of them have been viable.²² First, based on discussions with EPA enforcement officials, DPE requested proposals from third-party vendors for the use of a portable TO for use during steam cleanings of the 2mmlb tank. However, two of the EPA-recommended vendors declined to submit proposals due to technical challenges and/or lack of available engineering resources. One vendor did submit a proposal but failed to properly evaluate safety considerations such as the use of the TO with HCl scrubbing equipment and required heat exchanger equipment that would be necessary due to elevated temperatures from the steaming process. Attempting to apply this proposed method on other tanks would pose similar issues.²³

27. The Facility also considered using a new portable condenser and catch tank that would route steam vapors to an RTO for control. Unfortunately, this method would likely extend the length of plant turnaround times by unknown amounts of time with enormous costs.²⁴

28. DPE also considered nitrogen purging of the 2mmlb tank in which vapors would be routed to an RTO for control. However, this purging process would take multiple days longer than the current steaming process posing immense cost-per-day consequences.²⁵ At this time, I am still not certain how many days it would take to use this option each cleaning.

29. DPE requires substantially more time to adequately assess solutions to this new maintenance emissions cap. Based on the substantial analysis and investigation already committed to this requirement, I estimate that DPE would need two years or more to evaluate, acquire

²² See, e.g., DPE Comment at 88-89.

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.*