14. The enclosures that will likely be necessary to comply with the Final Rule pose serious concerns regarding occupational exposure, human health and safety, process maintenance, and product quality associated with enclosing the wash belts at the Facility. I am especially concerned with how an enclosure may impact safe ventilation in the finishing building. DPE's wash belt blower motors are equipped with variable frequency drives that allow a reduction of the total flow rate through the vents. An industrial hygienist is needed to evaluate any changes to the airflow through the vent hoods themselves or in other areas of the finishing building to ensure compliance with personnel exposure requirements, or to make recommendations for additional protective equipment. I also note that changes in airflow from enclosing the wash belts can negatively impact product quality, which also needs to be evaluated before enclosures are permanently installed.

15. Enclosing the wash belts also poses maintenance and repair considerations that concern me as an Environmental Affairs Manager. The wash belts require frequent manual intervention from DPE personnel to ensure stable operation. This requires physical access to the equipment to complete maintenance and repairs. As a result, I believe it is likely that any enclosures will need to be transparent and capable of easily and frequently being dissembled and reassembled.

16. Based on my prior experience installing existing enclosures at the Facility, the process safety concerns, and the necessary design, review, and approval process, I estimate a period of at least two years – and more likely 30-36 months – would be required before the new, much larger TO could commence operation and safely control emissions from the enclosures at the Facility. DPE's existing RTO and Monomer Emissions Reduction Project (MERP) control systems took nearly two years to design, approve, install, test, and place into service. The existing