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)
Permits 2814-V5, 2421-V10, 476-V9, and 1909-V3	

Responsible Official's Name/Title
Nattaya Boonsombat/Responsible Care Leader

Street Address
355 Highway 3142

City	State	ZIP Code
Hahnville	Louisiana	70057

Facility Name (if different from Responsible Official's Name)
St. Charles Operations

Facility Street Address (If different than Responsible Official's Street Address)

Facility Local Contact Name	Title	Phone (OPTIONAL)
Tom Nichols	EH&S Leveraged Air Specialist	1-985-783-3250

City	State	ZIP Code
Hahnville	Louisiana	70057-0059

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 St, Charles Operations site is requesting a one-year extension from the compliance date of July 15, 2026, to July 15, 2027, for the following projects and associated regulatory citations:

Project #1 – Dow is changing this project from a Thermal Oxidizer to a Flare - 40 CFR 63 Subpart G – 40 CFR 63.108 and 63.124 – Process Vents that are in ethylene oxide service – procedures to determine compliance.

Project #2 – Purge Glycol Reactor Project - 40 CFR 63 Subpart G

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

Project #3 – Dow is removing this project from the extension request. ~~Revised Emission Control System for Start-up Vents - 40 CFR 63 Subpart G – 40 CFR 63.124 – Process Vents and Storage Vessels that are in ethylene oxide service – procedures to determine compliance.~~

C.

Reasons why additional time is needed

A one-year extension is needed in order to properly engineer and construct these 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)
Nattaya Boonsombat	Responsible Care Leader	02 / 20 / 25

Signature of Responsible Official

Nattaya B.

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 – Dow is changing this project from a thermal oxidizer to a flare. An existing flare system will be recommissioned and repurposed to collect and control any process vents in Ethylene Oxide service from the Methyl Glycol Ethers Plant and the Higher Glycols Plant. The existing system will be instrumented to comply with the monitoring requirements for flares, and a new stand-alone flare stack will be constructed. There are some small process vents from these two HON covered plants that have minimal ethylene oxide emissions, but each process vent stream with 1 ppmv or more ethylene oxide must be controlled.

Project #2 – Installation of a process wastewater reactor system, called a Purge Glycol Reactor, to react small concentrations of ethylene oxide in process wastewater streams from the Oxide Plant and Site Logistics Area, Methyl Glycol Ethers Plant, and the Higher Glycols Plant to other chemical compounds. The reactor system will be operated at an elevated temperature and pressure to react low concentrations of ethylene oxide to other organic compounds. These small process wastewater streams from these three HON covered process units have minimal ethylene oxide emissions, but each process wastewater stream with 1 ppmw or more ethylene oxide must be controlled.

Project #3 – Dow is removing this project from the extension request.

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 these projects is planned to be initiated by August 1, 2026.

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

Compliance for these 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 these projects.

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

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