

- LDAR monitoring includes an additional estimated total cost of \$5.15 million with an annualized cost of \$340,000;
- Fenceline monitoring equipment estimated to cost an additional \$3.0 million with an annualized cost of \$200,000.

45. Note that these cost estimates are significantly greater than what EPA provided in both the Proposed Rule. As explained by DPE's expert consultants and based on my experience with purchasing, installing, and implementing control equipment at the Facility, in my opinion, the following EPA estimates are not accurate:

- \$560,000 in capital costs and \$330,000 in annualized costs for a condenser to comply with dioxins and furans limit (assumes infeasible refrigeration system is used rather than additional TO);
- \$5.84 million total capital investment and \$7.56 million in annualized costs for a wastewater steam stripper;
- \$5 million in equipment costs for a thermal oxidizer with total installed costs at \$10.1 million.

46. I reserve the right to further supplement this Declaration as I am given a more opportunity to study EPA's Final Rule requirements and supporting technical documents, and any further responses or information from EPA.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 26, 2024


CHRIS MEYERS, P.E.