

12. EPA's Final Rule instructs that the only viable way to capture chloroprene emissions from the identified sources and route them to a TO is to install three permanent total enclosures (PTEs):¹³

- One PTE for all five polymerization batch reactors;
- One PTE for the two wash belt dryers; and
- One PTE for the three emulsion storage tanks.

13. Although EPA indicated that there is no explicit requirement to install PTEs,¹⁴ I am not aware of an alternative option that can achieve the Final Rule requirements. As the Environmental Affairs Manager for the Facility, I am extremely concerned that the Final Rule fails to account for the technical and process safety challenges of enclosing the wash belts and equipment in the poly building required to meet the new standards. Capturing chloroprene from these areas is complex and will take time to plan and safely implement, especially considering capturing emissions from these areas involves sources that are not closely clustered at the Facility. For example, the wash belts are located in the finishing building, which is separate from the poly building, however, EPA had claimed they were in the same building in the Proposed Rule. Although EPA purports to acknowledge this burden in the Final Rule,¹⁵ it does not appear to me that EPA has given any meaningful, let alone adequate, consideration of the physical layout or technical limitations of the Facility's equipment when requiring that emissions be captured.

¹³ See Final Rule at 196-97 ("we continue to stand by our analysis"); *see also* ERG Control Options for Process Vents and Storage Vessels Memo at 7.

¹⁴ Final Rule at 198-199

¹⁵ See Final Rule at 198 (acknowledging that the wash belts are located in the finishing building rather than polymer building but reiterating that they still must be controlled under the Final Rule and that an additional TO is likely required).