



REGION 7

LENEXA, KS 66219

December 12, 2024

Sent via Certified Mail

Receipt Confirmation Requested

CT Corporation
Registered Agent for Elementis Specialties Inc.
120 South Central Avenue Suite 400
Clayton, MO 63105

Dear Registered Agent:

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency requests certain information about the Elementis Specialties, Inc. facility, located at 5548 Manchester Avenue, St. Louis, Missouri, 63110. The EPA requests this information to assess Elementis' compliance with the Clean Air Act.

Under Section 114 of the CAA, 42 U.S.C. § 7414, the EPA is authorized to require any person who owns and/or operates an air emission source to provide information to the EPA that is necessary to determine compliance with any provision of the CAA. Therefore, Elementis' response to Enclosure 1 of this letter is **required**. Please provide responses to the questions in Enclosure 1 no later than **30 days after receipt of this Request**. (See Enclosure 2 for instructions and definitions.)

In addition, sign and return the Statement of Certification (see Enclosure 3) with the response to this Information Request. This statement certifies that the information submitted in response to this request is true, correct, and accurate, and must be signed by someone with sufficient knowledge and authority to make such representations on behalf of Elementis.

Information requested by this letter must be submitted to the EPA regardless of a claim of confidentiality. If you believe any of the requested information is confidential, you may assert a confidential business information (CBI) claim under the provisions of CAA Section 114, 42 U.S.C. § 7414, and the regulations at 40 C.F.R. Part 2, Subpart B. Please see Enclosure 4 for additional instructions regarding submitting a CBI claim.

Failure to respond completely and truthfully to this Information Request is a violation of Section 114 of the CAA and could result in an enforcement action by the EPA. The CAA permits the EPA to seek the imposition of penalties of up to \$57,617 for each day of continued noncompliance. Section 113 of the CAA also gives the EPA the authority to seek criminal penalties from any person who knowingly makes any false statement, representation, or certification in any report required under the CAA.

This Information Request does not affect the obligation of Elementis comply with the CAA or any other federal, state, or local law. Please note that the EPA retains its authority to pursue appropriate enforcement actions, including penalties, for violations discovered as result of review of your response to this letter, regardless of whether the violations were subsequently corrected.

Thank you for your prompt attention to this request. If you have any questions relating to this information request, contact Joe Terriquez, Air Branch-Enforcement and Compliance Assurance Division, at (913) 551-7105 or via email at Terriquez.Joe@epa.gov.

Sincerely,

LANCE AVEY

Digitally signed by LANCE
AVEY
Date: 2024.12.12
08:50:48 -06'00'

Lance Avey, Acting Chief
Air Branch
Enforcement and Compliance Assurance Division

Enclosures

1. Enclosure 1 – Request to Provide Information
2. Enclosure 2 – Instructions and Definitions
3. Enclosure 3 – Statement of Certification
4. Enclosure 4 – Confidential Business Information (CBI)

cc: MoDNR, Shelby Miller- shelby.miller@dnr.mo.gov
Sara Hertz-Wu- hertzwu.sara@epa.gov
Brent Darnell- Brent.Darnell@elementis.com

ENCLOSURE 1

Request to Provide Information

QUESTIONS

Pursuant to the Clean Air Act, Elementis Specialties, Inc. (Elementis) must provide the following information and documents **within thirty (30) days of its receipt of this request**, unless otherwise specified herein.

1. Conduct Volatile Organic Compound (VOC) performance test using Method 18 on Bentone Flash Dryers EP 9 and EP 10 while producing the highest VOC containing formulation. A test plan must be submitted within 30 days from receipt of this request and approved prior to testing. The test report is to include Bentone production rate during the test (tons or lbs of Bentone per hour), along with pound per hour rate of VOC, and identification of each VOC pollutant. The test report shall be submitted to EPA within 90 days from the approval of the test plan.
2. Conduct VOC performance test using Method 18 on Benathix Fluid Bed Dryer EP 209 and EP 210 while producing the highest VOC containing formulation. A test plan must be submitted within 30 days from receipt of this request and approved prior to testing. The test report is to include Benathix production rate during the test (tons or lbs of Benathix per hour), along with pound per hour rate of VOC, and identification of each VOC pollutant. It is the EPA's understanding that this process is currently under repair and repairs are projected to take a few months. EPA is requesting that testing be conducted no later than 30 days from startup of the Benathix process. The test report shall be submitted to EPA within 60 days from the test.
3. Conduct a Modified Method 311 performance test for Alcohols to determine the capture efficiency from portions of the belt filters not covered by the thermal oxidizer hoods. This should encompass where the slurry comes out of the hose and is deposited on the belt to the portion of the belt that is covered by the vent hoods for Bentone Belt Filters EP 37, EP 38, and Benathix Vac Filter EP-237. The tests shall be conducted while producing the highest VOC containing formulation of each product. The premise of this test will be to use a mass balance approach that is capable of determining both the lb/hr rate and the percent capture efficiency across the filter processes for each process line, beginning with the introduction of slurry to the point where emissions are captured by the hoods leading to the thermal oxidizers. A test plan must be submitted within 30 days from receipt of this request and approved prior to testing. The test report is to include the production rate at which test was conducted along with pound per hour rates. The test report shall be submitted to EPA within 90 days from the approval of test plan. It is the EPA's understanding that this process is currently under repair and repairs are projected to take a few months. EPA is requesting that testing be conducted no later than 30 days from startup of the Benathix process. The test report shall be submitted to EPA within 60 days from the test for the Benathix process.
4. Verify that standing losses in the amine tanks are not occurring using an infrared VOC gas imaging camera or portable gas monitor using Method 21. If emissions are identified via monitoring previously mentioned, then Elementis must quantify VOC emissions using Method 18 or other methodology, to be approved by the EPA, within 120 days of detection of VOC

emissions from vents. Elementis may also choose to follow the procedures in AP-42 Chapter 7 for 7.1.3.8.4 “Heating Cycles for Fully insulated Fixed Roof Tanks” to determine standing losses in lieu of testing. The standing loss emission factor determined via testing or through AP-42 emission factor is to be used in calculating emissions inventory submissions.

ENCLOSURE 2

When providing the information requested in Enclosure 1, use the following instructions and definitions.

Instructions

1. Please identify the individual(s) including title, responsible for responding to this request.
2. Provide a separate narrative response to each question and subpart of a question set forth in Enclosure 1.
3. Precede each answer with the number of the question to which it corresponds. At the end of each answer identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted.
4. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
5. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
6. If information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
7. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify the EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 5, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in searchable Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. Submitters providing secured PDFs should also provide unsecured versions for the EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel format, and not in image format. If Excel format is not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel.

3. You may request to submit responses through a secure web link provided by the EPA. Please identify the email address you would like to use to receive the secure web link or identify an alternative secure method of transmitting the information.
4. Documents claimed as confidential business information must be submitted in separate file folders apart from the non-confidential information. The name of the separate file folders should clearly indicate that the contents contain information you claim as confidential business information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix A for designating information as CBI.
5. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, the implementing regulations, or below.

1. The terms “document” and “documents” and “documentation” and “records” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. “Elementis Specialties, Inc.” or “Elementis” or “you” or “your” includes any assumed business names, agents, representatives, employees, contractors, or other entities that performed work or acted in any way on behalf of, are related to, or acted at the direction of Elementis Specialties, Inc.
3. The term “facility” shall mean the facility located at 5548 Manchester Avenue, St. Louis, MO and shall be inclusive of the meaning of the term “stationary source,” as defined by 42 U.S.C. § 7411(a)(3), and shall include “any building, structure, facility, or installation which emits or may emit any air pollutant.”
4. All terms used in Enclosure 1 shall be consistent with those terms in the facility's Part 70 operating permit issued by the State of Missouri, Permit number OP2018-094.

ENCLOSURE 3

Statement of Certification

Elementis Specialties, Inc. is submitting the enclosed documents in response to EPA's Section 114 request for information to determine whether Elementis Specialties, Inc. is in compliance with the Clean Air Act.

I am a responsible officer of Elementis Specialties, Inc.

I certify under penalty of law that I have personally examined and am familiar with, the statements and information submitted in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, correct, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information, or omitting required statements and information, including the possibility of fine or imprisonment.

Date: _____

Signature: _____

Printed Name: _____

Title _____

ENCLOSURE 4

Confidential Business Information (CBI)

An entity may assert a business confidentiality claim covering all or part of the information provided in response to this Information Request for any business information entitled to confidential treatment under Section 114 of the CAA, 42 U.S.C. § 7414, and 40 C.F.R. Part 2, Subpart B. Under Section 114(c) of the CAA, entities are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets.

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the CAA and 40 C.F.R. Part 2, Subpart B. If no such business confidentiality claim accompanies the response to this Information Request when it is received by the EPA, then such information may be made available to the public without further notice. See 40 C.F.R. § 2.203(c).

To assert a business confidentiality claim, an entity must place on (or attach to) all information subject to the claim either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time it provides its response to this Information Request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and may be provided separately to facilitate identification and handling by the EPA. An entity should indicate whether confidential treatment is only required until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material claimed as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208(a)-(d) and 2.301. Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment. Please refer to 40 C.F.R § 2.301(e), special rules governing certain information obtained under the Clean Air Act.

Please submit your CBI claim to Joe Terriquez at *Terriquez.joe@epa.gov*.