

Administrator of the operating parameters that are planned to be monitored during the performance test prior to establishing operating parameter limits for the control device (40 CFR 63.124(a)(2)(viii)). Thus, there is a requirement to conduct performance testing and then to work with regulatory agencies to establish adequate monitoring parameters. This process is expected to take an unknown period of time for both UCC/Dow and regulatory agencies to reach agreement on these requirements.

- Both scrubber projects will drain the scrubber water from the scrubbers to the Purge Glycol Reactors for conversion of any ethylene oxide removed by the scrubber to other organic compounds. Concerns with the Purge Glycol Reactor projects are explained below.

Purge Glycol Reactor Projects:

The Seadrift, Texas site have process wastewater streams "in ethylene oxide service" that will need to be controlled in accordance with the amended HON rule. EPA's new standard for process wastewater in ethylene oxide service requires that individual process wastewater streams be managed in closed systems and then treated to remove ethylene oxide to less than 1 ppmw for each stream. Technology to implement the standard is not available prior to July 15, 2026, for the following reasons:

- Technology to implement the standard is not readily available from external vendors, therefore, UCC/Dow is designing and plans to install custom reactors to react ethylene oxide with water under selected operating conditions to meet the 1 ppmw requirement. There is not a vendor guarantee that this technology will meet the standard, thus performance tests will be required to confirm compliance.
- Additional time is needed to properly engineer and construct these types of reactors and capital projects. Typically, it takes 36 months to complete projects similar to these. More information is available in Attachment #1 on the major steps in the engineering, procurement, and construction process.
- In addition, EPA's HON rule does not have specific monitoring requirements for this type of treatment device, therefore, this site will be required to conduct performance testing and to submit a request to establish unique monitoring parameters per § 63.151(f)(1) – (3) of the HON rule to EPA or to the TCEQ. The frequency and content of monitoring, recording, and reporting will be determined in accordance with the permitting authority.

Explanation why an exemption is in the national security interests of the United States.

With respect to the national security implications of ethylene oxide-related supply chain disruptions, we incorporate the information provided by ACC and AFPM in a letter submitted to EPA related to these exemption requests. In addition, we also supply the following information:

The production plants covered by this exemption request at our Seadrift, TX site use ethylene oxide as a raw material to produce Glycol Ethers and Ethanolamines. Ethylene oxide is an important chemical precursor for these production plants and is used to produce a wide range of other chemicals, including military jet fuels, pharmaceuticals, semiconductors, automotive, agricultural products (note that ethanolamine products can be used in formulations