

22. DPE currently utilizes an air stripping system. This process occurs in the air sparging tank and routes to the onsite RTO.²⁰ However, as I previously discussed, the existing RTO does not have air flow capacity to take on additional waste streams, including chloroprene-containing air from a new steam stripper. Therefore, a new control device would need to be installed in addition to the new steam stripper to properly control the additional steam stripper wastewater streams at the Facility.

23. The Facility's current air stripping equipment and sparging tanks took more than 6 months to plan and implement, more than twice the 90 days EPA has given DPE to implement a new steam stripper system. And because steam stripping equipment is more complicated than air stripping equipment, it would take longer to safely plan, approve, install, test, and place steam stripping equipment into operation.

24. Based on my prior experience with the design and installation of wastewater control equipment at the Facility and evaluation work already completed by DPE personnel and outside consultants, I expect that the design, approvals, construction, installation, and testing of a new steam stripper together with a TO would take at least two years.

25. **Equipment to Limit Maintenance Emissions to 1 tpy.** The Final Rule imposes a 1 tpy cap on maintenance vent emission releases.²¹ Despite significant efforts, DPE has not yet identified feasible options for achieving this requirement.

26. The largest single source of emissions from maintenance activities is from annual steaming of the Facility's 2mm1b tank (approximately 660 lbs of emission associated with each

²⁰ Also note that the Facility uses an outdoor brine pit to control steam stripper rundown streams which are then routed to the WWTP and subject to biological control that achieves 80% reduction.

²¹ Final Rule at 20-21, 1168-69, 1175-76.