

will result in excess violations of applicable emission standards. Accordingly, the design of the new TO must consider the possibility of routing certain bypass lines to the TO.

18. The Facility has four closed vent systems to route process emissions from the Neoprene process area to the RTO: (1) a nitrogen-rich header for streams with high chloroprene concentrations; (2) an air rich header for streams with lower chloroprene concentrations; (3) the East Hot Dryer Vent; and (4) the West Hot Dryer Vent. The Facility's MERP is also a closed vent system which routes emissions from the monomer process area to the Halogen Acid Production Furnace (HAPF). In total, there are 19 bypass lines associated with the RTO and 8 bypass lines associated with the MERP that are required for safety reasons. As the Facility's Environmental Affairs Manager, I can attest that these bypass lines are rarely used—and only for emergencies (emissions from bypass lines made up less than 1% of the Facility's total emissions in 2022). These bypass lines are critical safety equipment for the Facility with low emissions consequences.

19. DPE will need time to safely design, plan, and implement new configurations to handle these potentially catastrophic flows. This may require designing the new TO to accept these vent streams, regardless of how infrequently they occur, or require substantial reworking of piping and ducting to accommodate the instrumentation required to meet the new monitoring standards. In my opinion, addressing the unqualified prohibition on bypasses will contribute to the Facility's need for 30-36 months to achieve implementation of the TO.

20. **Dioxins and Furans Emission Limit.** DPE needs additional time to complete testing for the presence of dioxins and furans. Additionally, the dioxins and furans limit further complicates the designing, planning, and implementation of an additional TO because additional condenser equipment or other control devices must be evaluated concurrently with the chloroprene Section 112(f) Control Projects. EPA's dioxins and furans technical support document assumed