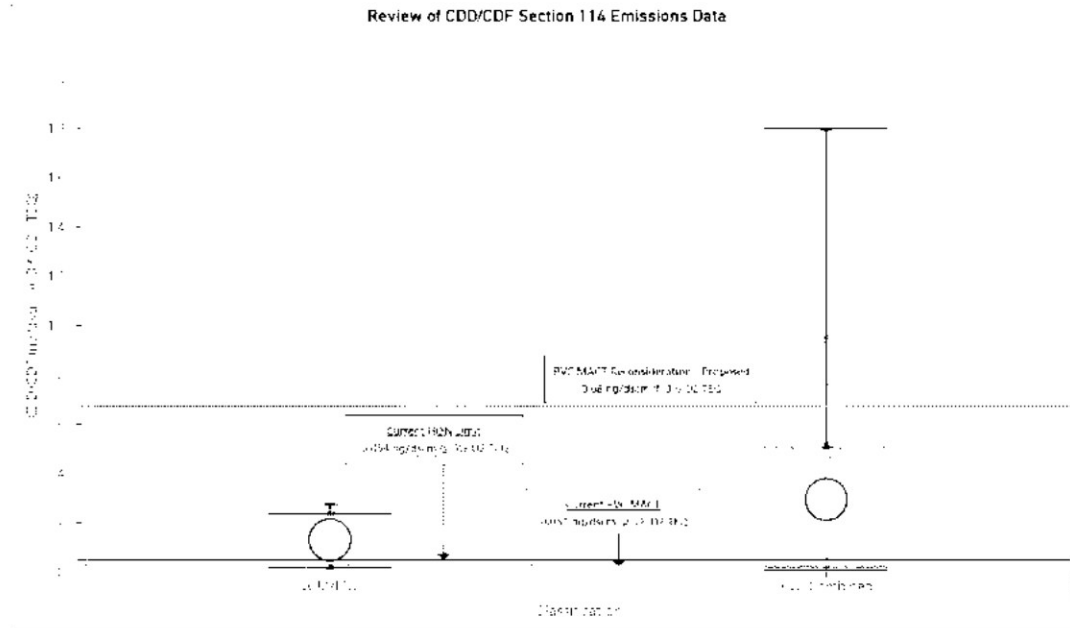


spanning the second (Q2) and third quartiles (Q3). The white circle represents the average or mean of the data. Whiskers extending from the top and bottom of the box show the range (maximum and minimum) of the data. Each test run is represented by small green dots in the plot.



The impact of this variability is even more pronounced when we take into consideration the fact that EPA undercounted the number of CMPUs subject to the HON D/F limit, discussed in greater detail below.

B. EPA's Estimation of the Number of CMPUs was Flawed

During our September 19, 2024, meeting, Agency staff suggested that there were possibly hundreds of facilities whose Group 1 stream likely “contained” chlorinated compounds. If that is the case, then this information was not available at the time of the comment period as the docket document consistently referenced 207 total HON facilities and 634 CMPUs, of which EPA estimated that at least 18 HON facilities and 34 CMPUs manufacture chlorinated compounds.¹⁵

In developing this estimate, EPA “expect[ed] that a majority of HON facilities and CMPUs do not have dioxin/furan emissions, as chlorine/chlorinated compounds must be present and

¹⁵ See *New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry*, 88 Fed. Reg. 25,080, 25,161-2 (Apr. 25, 2023); *Dioxins and Furans MACT Floor in the SOCM I Source Category for Processes Subject to HON and Processes Subject to Group I and Group II Polymers and Resins NESHAPs*, Docket ID No. EPA-HQ-OAR-2022-0730-0084 at p. 2, 8; *Residual Risk Assessment for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Source Category in Support of the 2023 Risk and Technology Review Proposed Rule* (March 2023), Docket ID No. EPA-HQ-OAR-2022-0730-0085, p. 3-4.