develop and implement the Section 112(f) Control Projects. Therefore, significant process safety steps will need to be developed before a restart. This includes drafting, reviewing, and finalizing safety procedures for any restart that follows a prolonged period of non-use. Obviously, installing the Section 112(f) Control Projects from an idled state will impact the amount of time necessary to comply with the Final Rule and I fully expect that it would take at least two years to shutdown the Facility, install such projects, and restart operations.

37. **Opinion 3: DPE has continued to reduce emissions through practicable and effective emission reduction strategies since May 2022. DPE plans to continue to implement such strategies during the compliance period.**

38. DPE has and continues to evaluate emission reduction opportunities at the Facility. Between 2016 and 2018, DPE reduced the Facility's emissions by 85%. This was in large part due to the installation of the Facility's current RTO. Since May 2022, I have continued to lead efforts to reduce emissions and the Facility has implemented a series of additional reduction strategies. Many of these strategies are completely voluntary.

39. As Environmental Affairs Manager, I have overseen a number of these reduction efforts, which are discussed below:

- DPE has implemented a process to reduce emissions associated with waste from the Facility's poly kettle production units consistent with the requirements of the consent agreement in EPA Docket No. RCRA-06-2023-0906, as well as applying a similar process to waste coagulant generated from the stripper strainers. DPE now steams the coagulant and routes emissions to the RTO. DPE has also improved its washing and nitrogen purging processes to further reduce emissions associated with the poly kettle production units.
- DPE has implemented a voluntary process to reduce the number of concurrently operating unstripped emulsion storage tanks and to strip chloroprene from in-tank coagulant during maintenance of the unstripped emulsion storage tanks. Now only two tanks are used at a time to reduce coagulate formation. The tanks containing coagulate are filled with water and are circulated to strip the remaining chloroprene and route emissions to the RTO.