



February 20, 2025

Ms. Mary Greene
Director, Air Enforcement Division
Office of Civil Enforcement
United States Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Ave, N.W.
William Jefferson Clinton Building/Room 1119
Washington, DC 20460-0001

Submittal of Additional Information Requested
Request for Extension of Compliance Time – Two Projects
Compliance with the Ethylene Oxide Provisions
40 CFR 63 Subpart G — *National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry (HON Rule)*
Union Carbide Corporation – Hahnville, St. Charles Parish, Louisiana
Title V Operating Permit No. 2814-V5 – Methyl Glycol Ethers Plant
Title V Operating Permit No. 2421-V10 – Ethanolamines Plant
Title V Operating Permit No. 1909-V3 – Higher Glycols Plant
Title V Operating Permit No. 476-V9 – Oxide Plant

Dear Ms. Greene,

This letter and the attached information provides additional information requested by USEPA in a letter December 20, 2024, regarding our request for an extension to the current July 15, 2026, due date for compliance with all ethylene oxide requirements in EPA's amendments to the HON air pollution rule (40 CFR 63 Subparts F, G, and H).

Our request for a compliance extension and these projects involve:

- Recommissioning of a flare and adding the required instrumentation to collect process vents and one storage tank in Ethylene Oxide service from the Methyl Glycol Ethers Plant and the Higher Glycols Plant; and
- Installation of a process wastewater reactor system, called a Purge Glycol Reactor, to react small concentrations of ethylene oxide in process wastewater streams from the Methyl Glycol Ethers Plant, the Higher Glycols Plant, the Oxide Plant, and Site Logistics to other chemical compounds.

Request for an Extension of Compliance
St. Charles Operations

These projects represent only a small subset of the HON implementation projects at the site and we seek an extension of compliance time only for what is absolutely necessary.

Pursuant to 40 CFR 63.6(i)(4)(i) and (ii) of the MACT rule general provisions our St. Charles Operations site is requesting a one-year extension from the compliance date of July 15, 2026, to July 15, 2027, for the two projects identified above. This extension is necessary in order to properly engineer the projects, order and obtain the equipment, and then construct and start-up the projects. Moreover, while the projects are being completed, we will take steps to protect against imminent endangerment, including by prioritizing our completion of other projects at the site that have higher air emissions. More details on our request and the schedule for implementation for the projects is included in the attached information, and we would be pleased to provide more details upon request.

If you have any questions or require additional information, please contact Mr. Tom Nichols at (985) 783-3250; email: tnichols@dow.com or Mr. Russell Wozniak of our Environmental Expertise organization at (361) 571-5420; email: wozniara@dow.com.

Sincerely,

Nattaya B.

Nattaya Boonsombat
Responsible Care Leader
St. Charles Operations

cc:

Mr. Steve Thompson
Air Enforcement Branch Chief
EPA Region 6
Compliance Assurance and Enforcement Division
1201 Elm St., Suite 500
Dallas, TX 75270-2102

LDEQ Office of Environmental Compliance
P.O. Box 4312
Baton Rouge, LA 70821-4312

Attachment