



February 26, 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 Seadrift, Texas Operations
Title V Operating Permit No. O2031 – Glycol Ethers Plant and & Oxide Derivatives
Plant
TCEQ Regulated Entity Number RN102181526
TCEQ Customer Reference Number CN601688781

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:

- Installation of two new vent scrubber projects to control any process vents that may contain low emissions of ethylene oxide, but that are "In Ethylene Oxide Service" from the Glycol Ethers Plant and the Ethanolamines Plant. The liquid from these scrubbers will be further processed in two Purge Glycol Reactors to convert any residual ethylene oxide to other organic compounds.
- Process wastewater streams from the Glycol Ethers Plant and the Ethanolamines Plant will also flow to the same Purge Glycol Reactors that are installed by the vent scrubber project. The Purge Glycol Reactors will react small concentrations of ethylene oxide to other chemical compounds.