

**Additional Information Requested by EPA
in December 20, 2024 Letter & 40 CFR 63.6(i)(10)**

Each of the requested items is provided for Projects #1 and #2.

**Process Vent Streams In Ethylene Oxide Service - Information
for Projects #1 and #2 – Installation of water scrubbers and
Purge Glycol Reactors.**

- **Identify each affected source covered by the extension:**

Process Vent Stream	Plant
Alcohol Recovery Column Vent Scrubber Vent – EPN 583	Glycol Ethers
Condensate Pot C-1219 Vent – EPN 781	Glycol Ethers
TEA Column Jet Vent – EPN 294	Ethanolamines
South Jet Condensate Tank Vent	Ethanolamines

- **Specify the termination date of the extension.**

The termination date of the extension will be July 15, 2027, for the installation of the vent scrubbers and their Purge Glycol Reactor systems. The termination date of the extension will be December 12, 2027, for the Notification of Compliance Status Report and other associated requirements as detailed below.

- **Specify the dates by which steps toward compliance are to be taken, if appropriate**

As noted above, construction is expected to commence on this project by August 1, 2026, with the goal of completing construction by June 1, 2027. A performance test on each scrubber along with establishment of operating parameters for each scrubber for continuous monitoring will be conducted after the start-up date.

- **Specify other applicable requirements to which the compliance extension applies (e.g., performance tests).**

We also propose extensions to the following items related to the start-up of the water scrubbers and the testing, monitoring, recordkeeping, and reporting requirements:

#1 – Scrubbers – Performance Testing and Establishment of Operating Parameters – §63.124(a)(2)(viii)

Dow proposes an extension for the scrubber monitoring requirements until December 12, 2027. This will allow time for the scrubbers to be placed into the service by July 15, 2027, and for the site to conduct performance testing and to work with the regulatory agencies to establish operating parameters.

#2 – Scrubbers – Continuous Monitoring of Operating Parameters – §63.124(b)(6)

Dow proposes an extension of these requirements until December 12, 2027, since the requirements in this section require the scrubbers to be in operation. Then, a performance test is required to establish the parameters that will be monitored on a continuous basis. This timing also aligns with the submittal of the Notification of Compliance Status report.

#3 – Scrubber Recordkeeping Requirements for Periods During Which Operating Values Are Outside of the Operating Limits Specified in §63.124(b)(6) - §63.118(f)(5)

Dow proposes an extension for these scrubber recordkeeping requirements in this section until December 12, 2027, to allow time for the scrubber to be placed into service, tested, and for operating parameters to be established.

#4 - Notification of Compliance Status Report - §63.152(b)(8)

Dow proposes that the due date for this report in be extended to December 12, 2027, to align with a date 150 days after the requested date extension for having the scrubbers in service to conduct testing and to determine the operational parameters to monitor.

#5 – Periodic Report - §63.152(c), §63.118(f)(5) and §63.108(l)(2)

Dow proposes that the due date for this report be extended to December 12, 2027, to align with a date 150 days after the requested date extension for having the scrubber in service. Portions of these sections require some scrubber operating data, such as periods during which operating values are outside of the applicable operating limits.

- Specify any additional conditions that the Administrator (or the State) deems necessary to assure installation of the necessary controls and protection of the health of persons during the extension period.

No additional information is being provided with this update.

Process Wastewater Streams In Ethylene Oxide Service - Information for Projects #1 and #2 – Installation of water scrubbers and Purge Glycol Reactors.

- **Identify each affected source covered by the extension:**

There are two existing process wastewater streams that will be collected and piped to the new treatment system. Two new process wastewater streams from the vent gas scrubbers will also flow into the new treatment system:

Process Wastewater Stream	Plant
C-1219 Condensate Drain South Jet Condensate Vessel	Glycol Ethers Ethanolamines
Liquid Stream from Glycol Ethers Vent Scrubber – New	Glycol Ethers
Liquid Stream from Ethanolamines Vent Scrubber – New	Ethanolamines

- **Specify the termination date of the extension.**

The termination date of the extension will be July 15, 2027, for the installation of the Purge Glycol Reactor systems and the termination date of the extension will be December 12, 2027, for the Notification of Compliance Status Report and other associated requirements as detailed below.

- **Specify the dates by which steps toward compliance are to be taken, if appropriate**

As noted above, construction is expected to commence on these projects by August 1, 2026, with the goal of completing construction by June 1, 2027. A performance demonstration along with establishment of operating parameters for continuous monitoring will be conducted after the start-up date.

- **Specify other applicable requirements to which the compliance extension applies (e.g., performance tests).**

Dow also proposes extensions to the following items related to the installation of the Purge Glycol Reactors and the testing, monitoring, recordkeeping, and reporting requirements:

#1 – Performance Demonstration and Establishing Parameter Monitoring Ranges – §63.146(a) and §63.151(f)(1) – (f)(3)

Dow proposes that the requirement in §63.146(a) for the owner/operator to submit a request to monitor alternative parameters according to the procedures in 63.151(f)

be extended to July 15, 2027, to align with the start-up date of the Purge Glycol Reactor.

Dow proposes that all due dates to complete the requirements in §63.151(f)(1) – (3) be extended to December 12, 2027, to allow time for a performance demonstration and setting of parameters after the Purge Glycol Reactors start operation.

Table 12 of the HON rule refers to §63.151(f), which requires compliance with paragraphs (f)(1) – (3) as copied below. Dow proposes an extension to December 12, 2027 to complete the performance demonstration, establish parameter monitoring ranges, and commence monitoring. This is five months after the requested extension date of July 15, 2027 to have the Purge Glycol Reactors installed. The rule text for §63.151(f) and (1) – (3) is provided below:

The owner or operator who has been directed by any section of this subpart that expressly references this paragraph to set unique monitoring parameters or who requests approval to monitor a different parameter than those listed in § 63.114 for process vents, § 63.127 for transfer, or § 63.143 for process wastewater of this subpart shall submit the information specified in paragraphs (f)(1), (f)(2), and (f)(3) of this section with the operating permit application or as otherwise specified by the permitting authority.
40 CFR 63.151(f).

- (1) A description of the parameter(s) to be monitored to ensure the control technology or pollution prevention measure is operated in conformance with its design and achieves the specified emission limit, percent reduction, or nominal efficiency, and an explanation of the criteria used to select the parameter(s).
- (2) A description of the methods and procedures that will be used to demonstrate that the parameter indicates proper operation of the control device, the schedule for this demonstration, and a statement that the owner or operator will establish a range for the monitored parameter as part of the Notification of Compliance Status report required in § 63.152(b) of this subpart, unless this information has already been included in the operating permit application.
- (3) The frequency and content of monitoring, recording, and reporting if monitoring and recording is not continuous, or if reports of daily average values when the monitored parameter value is outside the range established in the operating permit or Notification of Compliance Status will not be included in Periodic Reports required under § 63.152(c) of this subpart. The rationale for the proposed monitoring, recording, and reporting system shall be included.

#2 – Wastewater Parameter Exceedance Reporting - §63.146(d)(3)

Dow proposes that the due date for reporting monitoring results for each operating day during when the daily average of any monitored parameter approved in accordance with 63.151(f) was outside the range established in the Notification of Compliance Status be extended to December 12, 2027. This will allow to us conduct testing and setting of operating parameters after the systems start-up on or before July 15, 2027. This will also align with the submittal of the Notification of Compliance Status report. The identification of the treatment process, the parameter that was of range, and the date the parameter was out of range must be reported.

#3 – Wastewater Recordkeeping - §63.147(b)(4) and (e)

Dow proposes that the requirement in §63.147(b)(4) be extended to December 12, 2027. The requirement in §63.147(b)(4) is that for Item 3 of table 12 of this subpart, the owner or operator shall keep records approved by the Administrator. §63.147(e) notes that the Administrator will specify appropriate recordkeeping requirements.

#4 - Notification of Compliance Status Report - §63.152(b)

Dow proposes that the due date for this report be extended to December 12, 2027 to align with #1 above.

#5 – Periodic Report - §63.152(c)

We propose that the due date for this report be extended to December 12, 2027 to align with #1 above.

- Specify any additional conditions that the Administrator (or the State) deems necessary to assure installation of the necessary controls and protection of the health of persons during the extension period.

No additional information is being provided with this response.