

that a condenser would be installed prior to the existing control device, which in DPE's case is a thermal oxidizer.¹⁷ Based on the analysis performed by DPE's consultants,¹⁸ DPE would have to evaluate commercially available refrigeration systems that can achieve the temperatures required to recover or condense chloroprene out of the vapor streams. This evaluation would only be the first step towards compliance and there is no guarantee that it would provide a feasible option that meets the requirements of the Final Rule. If a feasible option is identified, it will take months to design, approve, install, and test such an option. If a feasible option is not identified, then the Facility will likely need to install and/or route the emissions to a new control device. Either option will significantly add to the time and complexity needed to implement the Section 112(f) Control Projects.

21. **Wastewater Steam Stripper.** The Final Rule requires wastewater streams that are in chloroprene service to comply with the requirements for Group I wastewater streams. This will likely necessitate the installation of a steam stripper to achieve reduction of chloroprene emissions from wastewater in chloroprene service.¹⁹

¹⁷ ERG, *Dioxins and Furans MACT Floor in the SOxMI Source Category for Processes Subject to HON and Processes Subject to Group I and Group II Polymers and Resins NESHAPs* (Mar. 2023) ("ERG Dioxins and Furans Memo"), Table 11 (costs based on refrigeration condenser technology that has been applied in the PVC industry).

¹⁸ See Montrose, *Dioxins and Furans Proposed Rules* (July 6, 2023). Montrose Environmental Group, Inc. ("Montrose") is a global environmental services provider specializing in emission control planning, measurement, and analysis, has worked closely with DPE over the past two years on nearly all aspects of potential options for chloroprene control at the Facility. Norton Engineering Consultants, Inc. ("Norton Engineering") is a consultant group with specialized expertise in thermal oxidizers has also assisted DPE in evaluating potential thermal oxidizer configurations and assisted Montrose in evaluating the dioxins and furans requirements proposed by EPA.

¹⁹ Final Rule at 22, 99, 202.