2014 NATA Ethylene Oxide Risk
Region 6 Update – July 18, 2019

Region 6 has shared information and discussed the 2014 NATA with its five states. Consistent with the national approach, we are focusing our attention on the areas with the highest estimated risks and the associated facility emissions in those areas.

In Region 6, Texas and Louisiana potentially have ethylene oxide (EtO) risk areas, and we have actively engaged with those two primary states. We have evaluated emissions, permits, NESHAP regulatory applicability, and compliance at relevant facilities in those areas. We updated the 2014 NATA estimates with the most recent information and, without further modeling, made rough, revised risk estimates.

After multiple discussions and meetings with Texas and Louisiana, Region 6 is supporting state efforts to further examine/reduce EtO risks and emissions. Knowing that the MON due out this summer will not completely resolve EtO issues for Region 6 facilities, the states are investigating additional approaches for reducing emissions.

State efforts to reduce emissions:

- Louisiana
    - Sent letters to all permitted emitters of EtO requesting that they review their emissions data and explore proactive measures to reduce EtO emissions.
    - LDEQ has had subsequent discussions with its facilities.
    - EPA provided the state with possible voluntary actions available to industry to reduce EtO emissions.
    - LDEQ has requested joint messaging with Region 6 for EtO (i.e., Region 6 will keep LDEQ in the loop on related developments and work together on any external messaging, keeping in mind that LDEQ is actively in discussions with its facilities).
- Texas
    - TCEQ proposed a revised state health effects screening level (ESL) for EtO. On June 28, 2019, TCEQ released a draft ESL development decision document for public comment. Region 6 shared this document with OAR, OAQPS, and ORD. Louisiana, who has a state ambient air toxics standard for EtO, is also closely following TCEQ's efforts.
    - TCEQ communicated to Region 6 that the TCEQ is comfortable with its level of communication and interaction with the relevant offices at EPA regarding future decision making and Texas's efforts to revise the state EtO screening level.

Ex. 5 Deliberative Process (DP)