UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

October 15, 2020

Tonya Baer
Deputy Director
Office of Air, MC-122
P.O. Box 13087
Austin, Texas 78711-3087

Dear Ms. Baer:

On March 31, 2020, the United States Environmental Protection Agency Office of the Inspector General (OIG) issued a Management Alert regarding ethylene oxide emissions. The EPA Inspector General recommended the EPA Region 6 work with the states of Texas and Louisiana on facility/area-specific technical assessments and sharing information with nearby communities, as appropriate.

The EPA Region 6 is committed to working with the state of Texas to develop facility/area-specific technical assessments in the high-risk areas identified by the most recent National Air Toxics Assessment (NATA) report. In the EPA's preliminary assessments, three of the four facilities in Texas appear to have experienced reductions in ethylene oxide emissions since 2014. Attachment 2 outlines our proposed technical approach/steps to complete these assessments, including the information needed from our state regulatory partners.

This letter is to request TCEQ's assistance in gathering the most current information on the specific facilities listed in Attachment 1 by November 12, 2020, to assist with the development of technical assessments.

We appreciate your cooperation in this matter and look forward to further communication between our respective staff. If you have any questions, please contact me at (214) 665-7593 or Mr. Jeff Robinson at 214-665-6435.

Sincerely,

10/15/2020

X

David F. Garcia, P.E.

Signed by: DAVID GARCIA
Director
Air and Radiation Division

Attachment 1: List of Facilities
Attachment 2: Information Needs and Requests

Attachment 1 - List of Facilities

Huntsman, Port Neches Operations, Port Neches, TX
6001 FM366, Port Neches, TX 77651

Eastman Chemical Texas Operations, Longview, TX
300 Kodak Blvd. Longview, TX 75602

Midwest Sterilization Corp., Laredo, TX
12010 General Milton Dr, Laredo, TX 78045

Shell Technology Center, Houston, TX
3333 Hwy 6, Houston, TX 77082

Attachment 2: Information Needs and Requests

NO.	Technical Task	Specific Requests to States
1	Obtain and evaluate 3 years of EI/TRI data (2017-2019) to determine how ethylene oxide (EtO) emissions are fluctuating.	• 2019 state EtO emissions data and event emissions data • Description and dates of significant EtO emissions changes since 2017
2	Check for malfunction or emission events related to EtO reported to the EPA National Response Center or the States' Response Centers.	• (2020) EtO event emission reports for each facility • Investigations of EtO emission events and the results
3	Obtain copies of relevant air permits and analyze for EtO emission limits and MACT applicability for each facility.	• Latest air permits for each facility • MACT rule applicability at each facility • Specific EtO emission points/emissions/rule applicability
4	Document any/all known expansion/reduction plans, specifically related to EtO, for each facility.	• Pending permit applications related to EtO emissions • Known facility expansion or reduction plans related to EtO emissions
5	Identify emission controls for each facility process area that addresses EtO emissions.	• Existing control device(s) description on EtO emissions • Potential additional EtO emission controls options
6	Coordinate with other EPA regions for activities about emissions reduction controls, improved emission estimates, and community outreach efforts at the facilities with same parent company as facilities in EPA Region 6.	• *No specific request to states: Information on any EtO emission reductions or undertaken at facilities as a result of similar actions at facilities with the same parent company outside of EPA Region 6.*
7	Review and evaluate new information on facilities addressed in the revised MON NESHAP rule.	• *No specific request to states: Federal Register Notice and link to MON rulemaking docket has been shared with Region 6 states.*
8	Obtain 2020 update on EI/TRI and permitted rates of EtO for each facility.	• Available 2020 EtO emissions & event emissions data • Current permitted emission limits at each facility
9	*TX only:* Identify any TCEQ air permit modifications that will be evaluated against the new TX EtO effects screening level (ESL). Review TCEQ EtO ESL modeling results. [1]	• Permit modifications that will be evaluated against the new TX EtO ESL • Modeling results compared to new TCEQ EtO ESL

[1] TCEQ ESL work is not SIP approved. Air permits would need to simply check permit records to ensure all appropriate NESHAP requirements are applicable. We may be able to at some point in the future to determine what TCEQ's conclusions were on new NSR projects with EtO emissions.