Message

From: Casso, Ruben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E33DF0ABBBF049959E9100E556C7E634-CASSO, RUBEN]
Sent: 9/30/2021 7:44:07 PM
To: Verhalen, Frances [verhalen.frances@epa.gov]
Subject: RE: Discrepancy in Sasol's EO emissions

From Sasol's presentation. I'm going to see if I can find anything we might have received earlier on a different 2014 number.

YEAR	PERMITTED EO EMISSIONS	ACTUAL EO EMISSIONS
2015	16.856 tons	1.573 tons
2016	16.856 tons	0.748 tons
2017	16.856 tons	1.053 tons
2018	16.856 tons	1.119 tons
2019	16.856 tons	1.588 tons
2020	16.856 tons	2.352 tons

From: Verhalen, Frances <verhalen.frances@epa.gov>
Sent: Thursday, September 30, 2021 2:34 PM
To: Casso, Ruben <Casso.Ruben@epa.gov>
Subject: FW: Discrepancy in Sasol's EO emissions

Any truth to this?

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From: Terrell, Kimberly A <kterrell1@tulane.edu>
Sent: Thursday, September 30, 2021 2:01 PM
To: Verhalen, Frances <verhalen.frances@epa.gov>
Cc: Tejada, Matthew <Tejada.Matthew@epa.gov>; Jordan, Lisa W <lwjordan@tulane.edu>; Vaughn, Gloria

<Vaughn.Gloria@epa.gov>
Subject: Discrepancy in Sasol's EO emissions

Dear Frances Verhalen,

We are looking forward to the EPA meeting tonight RE Sasol. However, there is a major discrepancy in the ethylene oxide data that EPA Region 6 provided in its draft presentation. As you are aware, in Oct 2019, Sasol submitted recalculated ethylene oxide emissions for 2014-2018. However, EPA's graph uses the original reported value (12,640 lbs) for 2014, followed by the recalculated values (~2,000 lbs) for 2017-2018, in an apparent attempt to portray an emissions reduction.

Because it combines original and recalculated data in a graph that purports to portray temporal trends, EPA's approach is blatantly misleading. We request that this graph be corrected to show Sasol's recalculated emissions for 2014-2020 (including 2015 and 2016, which were omitted from the Powerpoint). If EPA intends to present the original emissions values, these values should be presented as a separate data series.

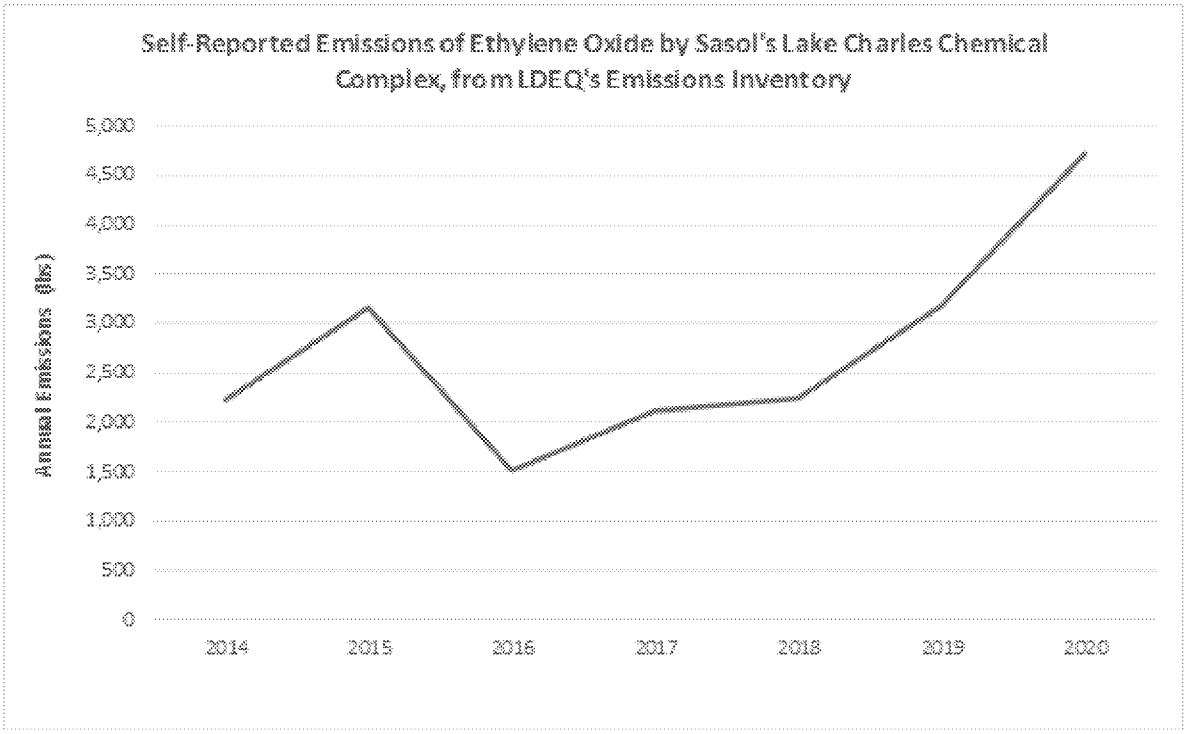
I have included the slide in question below, along with a corrected version, based on Sasol's recalculated 2014 emissions data. Please feel free to follow up with any questions. We are sincerely looking forward to the opportunity to meet with you tonight.

Warmly,

Kim

From slide 19 of EPA's Powerpoint:

Prepared from LDEQ emissions inventory:



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