Message

From: Hensley, Dave [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A78AA7F71974494F950E52A18E1192B3-HENSLEY, DAVE]
Sent: 6/21/2022 4:33:05 PM
To: Barrientos, Brittany A. [brittany.barrientos@stinson.com]; Sena, Lorenzo [Sena.Lorenzo@epa.gov]; Harper, Jodi [Harper.Jodi@epa.gov]
CC: Shawn Thomas [SThomas@BALCHEM.COM]; Donald Hossli [DHossli@balchem.com]; Gregory Henthorn [GHenthorn@BALCHEM.COM]; Ellis Johnson, Kristen M. [kristen.johnson@stinson.com]; Mark Stach [MStach@BALCHEM.COM]
Subject: RE: BCP Ingredients - Response to Document Request

Hi,

The documents were received and downloaded successfully. We will review and be in touch if we have questions.

Dave Hensley
Chemical Accident Prevention Section
Air Branch
Enforcement & Compliance Assurance Division
Region 7 U.S. Environmental Protection Agency

From: Barrientos, Brittany A. <brittany.barrientos@stinson.com>
Sent: Friday, June 17, 2022 7:51 PM
To: Hensley, Dave <Hensley.Dave@epa.gov>; Sena, Lorenzo <Sena.Lorenzo@epa.gov>; Harper, Jodi <Harper.Jodi@epa.gov>
Cc: Shawn Thomas <SThomas@BALCHEM.COM>; Donald Hossli <DHossli@balchem.com>; Gregory Henthorn <GHenthorn@BALCHEM.COM>; Ellis Johnson, Kristen M. <kristen.johnson@stinson.com>; Mark Stach <MStach@BALCHEM.COM>
Subject: BCP Ingredients - Response to Document Request

Dave, Lorenzo and Jodi:

I am writing on behalf of BCP Ingredients, Inc. As you know, EPA conducted an RMP inspection of the BCP Ingredients inspection June 7-9, 2022. During the inspection EPA reviewed a number of documents, then developed and left behind a list requesting additional documents. Because of the volume of documents, the need to claim CBI on some documents, and BCP's desire to provide a bates-numbered document set, BCP requested to submit the documents to EPA in electronic format. EPA agreed and requested that BCP provide the documents by today. This note is to confirm that the documents were timely uploaded this afternoon to the drop box you sent on 6/10. The files were uploaded as a zip file. As we discussed, some of the information is marked as CBI. Those documents are labeled with "Confidential Business Information" both on the documents and in the document title. The CBI substantiation request is also included in the drop box link. In the event any documents are not substantiated, we would appreciate EPA letting us know and BCP will provide non-CBI marked documents if necessary. Jodi, I believe you said you are the CBI coordinator. If you or your team have difficulty accessing the documents, please let us know and we will work to resolve issues ASAP.

Also, to follow up more substantively, BCP believes the documents are responsive to each of EPA's requests, and it is apparent to which request they respond. If you have questions matching up the documents or about responses to specific requests, please let us know. In addition, we provide the following context for the response:

- BCP understands that EPA requested 2022 draft PHA documents. These are currently being revised and are still in the development and review process. BCP has existing versions of those PHAs, but the company understands those are not what you are requesting at this time. BCP will supplement this response with the revised PHAs when the internal review process is complete.

- In response to the question regarding the Verona PHA, BCP's response includes PHAs for the covered processes, as required by 40 CFR 68.67.
- As to the requests for multiple versions of the ethylene oxide unloading SOP, changes from the prior August 2021 version are visible on the document responsive to the prior request. The prior version is not separately provided, as it is locked out and has been superseded.

In addition, since the inspection, BCP has been evaluating and implementing corrective actions in response to EPA's notification of preliminary findings. BCP will provide a summary of the work is has accomplished next week. BCP requests this information be considered in developing the inspection report. Lorenzo, if your timeline has changed and you need information before the end of next week, please let us know and we can modify our timelines accordingly.

If anyone has questions or needs additional information, please let us know. Thanks all. Have a good weekend.

Brittany

Brittany A. Barrientos
Partner
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