Message

From: Queiroz, Gustavo [queiroz.gustavo@epa.gov]
Sent: 12/29/2021 2:35:12 PM
To: Shawn Thomas [SThomas@BALCHEM.COM]; HertzWu, Sara [HertzWu.Sara@epa.gov]; Algoe-Eakin, Amy [Algoe-Eakin.Amy@epa.gov]; Steven.Hall@dnr.mo.gov
CC: Barrientos, Brittany A. [brittany.barrientos@stinson.com]; Mark Stach [MStach@BALCHEM.COM]; Burns, Ward [Burns.Ward@epa.gov]; Watterson, Sarah [Watterson.Sarah@epa.gov]
Subject: RE: BCP Follow-up Actions from our December 7, 2021 Meeting

Thank you Shawn. Our ARD DCA is Ward Burns (copied here) with EPA Region 7. I am also including general guidelines below for mailing CBI to our offices. Also copied in this email is Sarah Watterson who is our office manager.

The EPA R7 address is shown below.

U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
913-551-7543

General Guidelines for Mailing CBI Materials to Region 7:

Mailing CBI Material to EPA Region 7

A facility should take the following steps when mailing confidential business information (CBI) to APCO staff:

- The material should be double wrapped;
- The inner envelope/wrapping should contain the name of the recipient and the statement "Confidential Business Information – To Be Opened by Addressee Only";
- The outer envelope/wrapping should be addressed as normal with no CBI markings;
- The package should be addressed to either the ARD DCA (Ward Burns);
- The package/envelope should be shipped certified mail with a return receipt. Other services (such as FedEx or UPS) are acceptable if a documentation of receipt by Region 7 is provided.

CBI should never be e-mailed to EPA.

Following these steps will reduce the possibility of accidental release of the facility's information.

From: Shawn Thomas <SThomas@BALCHEM.COM>
Sent: Wednesday, December 22, 2021 2:52 PM
To: HertzWu, Sara <HertzWu.Sara@epa.gov>; Queiroz, Gustavo <queiroz.gustavo@epa.gov>; Algoe-Eakin, Amy <Algoe-Eakin.Amy@epa.gov>; Steven.Hall@dnr.mo.gov
Cc: Barrientos, Brittany A. <brittany.barrientos@stinson.com>; Mark Stach <MStach@BALCHEM.COM>
Subject: BCP Follow-up Actions from our December 7, 2021 Meeting

Amy and Gustavo,

Thank you again for the opportunity to discuss BCP's status of its Ethylene Oxide evaluation in advance of EPA's public meeting. It was nice to see you there. In our meeting, we discussed providing EPA and MDNR the following information:

- LDAR Testing Program
- LDAR records (2018-2021)
- P&IDs showing the EO process
- Information re: wastewater evaluation

- Information re: stack testing

As we discussed in our meeting, BCP has retained a new consultant to assist in this evaluation. They have reviewed the LDAR Testing Program and LDAR records, and BCP is ready to submit them. A few LDAR records are not included (Q3 and Q4 from 2020, and Q1 and Q3 2021), but relevant personnel are out for the holiday and we need assistance locating them. We will provide the outstanding LDAR records in the new year. Also, BCP and its consultant are evaluating the LDAR program and anticipating making changes and improvements to it. In the event EPA or MDNR have any comments, please feel free to send them over and we can evaluate them as part of BCP's overall revisions. BCP is also prepared to provide the P&IDs for the ethylene oxide process, including P&IDs for V19, the wastewater treatment area, and the EO scrubber.

These documents contain confidential business information. We understand documents containing CBI are typically submitted in hard copy in accordance with specific procedures. We are happy to submit them that way, but wanted to confirm that is EPA's preference. We are happy to send them encrypted to EPA with an accompanying confidentiality substantiation if that is acceptable. If it is, please let me know who I should direct them to and I will send them over.

BCP also has the following updates:

- We have identified a stack testing company and are awaiting a proposal. We will share the scope of the proposal with EPA when received.
- BCP's consultant confirmed the facility is not a major source of Ethylene Oxide. The facility's actual EO emissions are well below the 10 TPY single HAP standard, and the facility has taken a voluntary limit in its Part 70 Operating Permit to remain below the 10 TPY single, 25 TPY combined HAP thresholds. As we discussed, BCP is evaluating its PTE notwithstanding the voluntary limit below major source thresholds and will keep EPA updated.

If you have any other questions, please let me know. Please also let me know how to submit the P&IDs and we can get those to you quickly. We will provide updates on the stack testing as they arise. I'll be out of the office through the new year, but I will be checking e-mail periodically. Thank you.

Shawn P. Thomas, PE
Director EHSS
Balchem Corporation