



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

**VIA ELECTRONIC MAIL**  
**RETURN RECEIPT REQUESTED**

*brittany.barrientos@stinson.com*

Brittany A. Barrientos  
Partner  
Stinson LLP  
1201 Walnut Street, Suite 2900  
Kansas City, Missouri 64106-2150

Re: BCP Ingredients, Inc.  
Verona, Missouri

Dear Ms. Barrientos:

Thank you and your client for taking the time to speak with my staff, the Air and Radiation Division, and the Office of Regional Counsel on February 23, 2023, regarding the BCP Ingredients, Inc. (BCP) facility in Verona, Missouri. The discussion was productive and assisted the Environmental Protection Agency's understanding of some process changes that BCP is making after the EPA expressed concerns about emissions of Ethylene Oxide (EtO) during the unloading of railcars.

The EPA's concerns stem from preliminary observations during the February stack test at the facility. It is our understanding, based on representations by BCP in the February 23 discussion, that BCP has taken steps to address the EPA's concerns. Specifically, BCP stated that it has implemented an interim Management of Change (MOC)<sup>1</sup> related to the unloading of railcars containing ethylene oxide. BCP stated that it is now venting railcars to the existing Tank #2 rather than to the scrubber. The EPA supports BCP's efforts to reduce emissions of EtO.

BCP stated that it is working on a permanent MOC for this RMP-covered process and will provide this document to the EPA. The EPA requests that BCP also provide any attachments to the MOC and any resulting new or revised Standard Operating Procedures. BCP should explain how this new procedure is different from previous unloading procedures and provide supporting data demonstrating that this change in process is safe. As discussed during the call, the EPA also requests that BCP provide all unloading checklists completed in the last five years from the date of receipt of this letter.<sup>2</sup> The EPA requests that this information be provided no later than March 31, 2023.

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<sup>1</sup> The regulations regarding Management of Change are found at 40 C.F.R. § 68.75.

<sup>2</sup> The unloading checklists in this request are described in section 7.1.24 of the most current edition of the BCP Ethylene Oxide Unloading B-4000 SOP.

BCP is required to ensure that the new MOC covering the railcar unloading process is designed in a safe manner (e.g., ensure tank pressure is appropriate to prevent accidental releases). We expect that additional information may be necessary to confirm that the change in process is safe.

If you have any questions, please feel free to contact Dave Hensley, of my staff, at (913) 551-7768, or Sara Hertz Wu, the attorney working on this matter, at (913) 551-7316.

Sincerely,

David Cozad  
Director  
Enforcement and Compliance Assurance Division