



REGION 6

DALLAS, TX 75270

July 16, 2026

Stacy Hester
SSHE Manager
Gulf Coast Growth Ventures LLC
4589 FM 2986
Gregory, TX 78359

Dear Ms. Hester:

This letter responds to your February 6, 2026, letter on behalf of Gulf Coast Growth Ventures LLC (GCGV) requesting approval of alternative monitoring parameters under the National Emission Standards for Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (40 CFR Part 63, subpart G) ("the HON Rule"). In its letter, GCGV requests alternative monitoring parameters for its wastewater streams in ethylene oxide (EO) service that require treatment in the Monoethylene Glycol (MEG) unit of the GCGV facility. Based on the information provided in GCGV's request and additional materials submitted on May 29, 2026, regarding the design and configuration of the wastewater treatment process, the U.S. Environmental Protection Agency (EPA) conditionally approves GCGV's alternative monitoring petition. As outlined in this response, this approval of alternative monitoring parameters is contingent on the successful completion of performance testing to demonstrate compliance with the emission limits and performance standards in the HON Rule.

In its letter, GCGV requested site-specific wastewater treatment monitoring parameters on a process that collects and heats the EO service wastewater ("the Treatment Process"). The Treatment Process converts the EO in the heated wastewater to ethylene glycols through hydrolysis reactions. The treated effluent wastewater then travels to GCGV's wastewater treatment plant for further treatment. According to its letter, GCGV expects the concentration of EO downstream of the Treatment Process to be less than 1 part per million by weight (ppmw). GCGV proposes to monitor wastewater temperature and wastewater flow continuously to ensure the treated EO wastewater meets the performance standard of less than 1 ppmw. GCGV submitted this Request for Approval to Monitor Alternative Parameters as specified in 40 CFR 63.146(a) because the treatment process planned at the facility is not listed in Table 12 of the HON Rule.

As a condition of this approval, GCGV will establish an acceptable wastewater temperature and flow operating range and conduct an initial performance test of the Treatment Process and submit the results in a Notification of Compliance Status to EPA Region 6 and the Texas Commission on Environmental Quality (TCEQ) per the requirements of 40 CFR 63.152(b) by December 12, 2026. The

performance testing consists of an analysis of six samples collected upstream and six downstream of the Treatment Process to ensure that the facility has achieved the targeted EO reduction efficiency from the Treatment Process. Inlet and outlet samples shall be collected concurrently and be separated by a minimum of thirty minutes. The analysis will use procedures specified in EPA Method 8260D. GCGV will provide EPA with data supporting the temperature and flow operating ranges and a copy of results of the performance test, including the monitoring data obtained during the test. Data in the results of the performance test shall include wastewater inlet and outlet temperature, wastewater flowrate, and outlet EO concentration measured in ppmw.

EPA Region 6 has coordinated our evaluation of the proposed alternative monitoring parameters with EPA's Office of Clean Air Programs. This conditional approval is site-specific to the Treatment Process for wastewater streams in EO service in the MEG unit at the GCGV facility in Gregory, Texas. To demonstrate ongoing compliance with 40 CFR Part 63, subpart G, GCGV shall compare the hourly average of wastewater temperature and flow to the range established by GCGV and perform biannual wastewater inlet/outlet testing consisting of six paired samples collected, in the same manner as the initial performance test, at each location with analysis conducted using EPA Method 8260D. Biannual testing shall be conducted no less than 5 months and no greater than 7 months after the preceding test. Submit the results of the biannual testing to EPA Region 6 and TCEQ no later than 60 days after completion of the test. GCGV must maintain continuous record of the wastewater temperature and wastewater flow rate according to 40 CFR 63.152(b)(4) and submit the monitoring results for each day during which the daily average value was outside the established range according to 40 CFR 63.146(d)(3).

If monitoring and/or testing shows that the facility is not in compliance with the HON Rule emission limits and performance standards, EPA may require retesting and the treatment process monitoring parameters conditionally approved in this petition may require modification. If GCGV determines a new or modified set of treatment process monitoring parameters is necessary for the MEG unit at the GCGV facility to achieve and maintain compliance with the HON Rule, GCGV must submit a revised alternative monitoring petition prior to retesting, along with a revised test plan for review and approval.

If you have any questions about this conditional approval, please contact Mr. Ben Rosenthal of my staff at 214-665-6543 or at rosenthal.benjamin@epa.gov.

Sincerely,

STEVEN
THOMPSON

Digitally signed by
STEVEN THOMPSON
Date: 2026.07.16
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Steve Thompson
Branch Chief
Air Enforcement Branch
Enforcement and Compliance
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cc:

Andrew Bouchard, OCAP
Kristi Mills-Jurach, TCEQ
Sydney Hansen, ExxonMobil