



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

January 18, 2022

Mr. Russell Wozniak
US Air Advocacy Leader & California Regulatory Affairs Leader
The Dow Chemical Company
Seadrift Operations
P.O. Box 186
Port Lavaca, Texas 77979

Dear Mr. Wozniak,

Pursuant to section 114 of the Clean Air Act (CAA), 42 U.S.C. §7414(a), the U.S. Environmental Protection Agency (EPA) is collecting information related to hazardous air pollutant (HAP) and volatile organic compound (VOC) emissions at chemical manufacturing facilities to inform its review under CAA sections 112(d)(6) and 111(b)(1)(B), as applicable, of various National Emission Standards for Hazardous Air Pollutants (NESHAP) and New Source Performance Standards (NSPS). These rules include, but are not limited to, the Hazardous Organic NESHAP or HON (40 C.F.R. part 63, subparts F, G, H & I); NESHAP for Group I Polymers and Resins (40 C.F.R. part 63, subpart U); NESHAP for Polyether Polyols Production (40 C.F.R. part 63, subpart PPP); Standards of Performance for VOC Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes (40 C.F.R. part 60, subpart III); Standards of Performance for VOC Emissions From SOCMI Distillation Operations (40 C.F.R. part 60, subpart NNN); Standards of Performance for VOC Emissions From SOCMI Reactor Processes (40 C.F.R. part 60, subpart RRR); and Standards of Performance for Equipment Leaks of VOC in the SOCMI for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 (40 C.F.R. part 60, subpart VVa). As part of this effort, the EPA requires your assistance in providing responses to this Information Collection Request (ICR) related to these regulations, emissions, and emission sources.

Specifically, we are collecting information from the following chemical manufacturing facilities listed below:

Facility	Street Address	City	State
The Dow Chemical Company – Louisiana Operations	21255 Hwy 1	Plaquemine	LA
The Dow Chemical Company – Texas Operations	2301 N Brazosport Blvd	Freeport	TX
The Dow Chemical Company – U.S.A., Midland	1790 Building Washington St	Midland	MI

There are two general components to this request including a survey component (Component I) and a testing and sampling component (Component II). These components are designed to collect information on emissions and other relevant aspects of chemical manufacturing operations. Enclosure 1 contains a summary of the instructions for completing both components.

Please note that emissions data provided under section 114 of the CAA is not entitled to confidential treatment under 40 C.F.R. Part 2.¹ There is a small amount of information requested in this survey request that you may claim as confidential and it has been already marked as such in Component I. If there is any facility operations information, other than emissions data, that you would like to claim as confidential business information (CBI), please follow the instructions in Enclosures 1 and 5 to ensure appropriate handling and submission of your response. You are required to return all requested information on or before **the various dates specified in Table 4 of Enclosure 1**. Please also note that our contractors or other authorized representatives, discussed in Enclosure 4, must follow the policies and procedures for handling trade secrets and CBI outlined in Enclosure 5, which ensure your rights and protect any privileged information you submit to us.

Supplemental information about this request is provided in the following enclosures:

Enclosure #	Description
Enclosure 1	Clean Air Act Section 114 Information Collection Request For Chemical Manufacturers - Survey Questions, Testing, and Submittal Instructions
Enclosure 2	EPA's Information Gathering Authority Under Section 114 of the Clean Air Act
Enclosure 3	Disclosure of Emissions Data Claimed as Confidential Under Sections 110 and 114(c) of the Clean Air Act
Enclosure 4	Designation of Authorized Representative for Standards of Performance for New Stationary Sources (Section 111), National Emission Standards for Hazardous Air Pollutants (Section 112), Solid Waste Combustion (Section 129), and Federal Ozone Measures (Section 183)
Enclosure 5	Summary of Procedures for Safeguarding Clean Air Act Confidential Business Information
Enclosure 6	Certification Statement

This ICR is one step in an established public process for collecting foundational information as part of our NESHAP and NSPS reviews required under sections 112(d)(6) and 111(b)(1)(B) of the CAA. The public and stakeholders will continue to have an opportunity to comment on EPA's chemical manufacturing NESHAP and NSPS rules, including a formal notice-and-comment period on any proposed action. CAA section 114(a) authorizes the Administrator of EPA to require the submission of information, including information from an owner or operator of an emission source for the purpose of developing or assisting in the development of NESHAP under CAA section 112 and NSPS under CAA section 111. This authority has been delegated to the Director of the Sector Policies and Programs Division in the U.S. EPA Office of Air and Radiation, Office of Air Quality Planning and Standards.

¹ For additional information on emission data, please see 40 C.F.R. §2.301 and Enclosure 3.

Thank you for your assistance in this effort. Your response will provide comprehensive information about the chemical manufacturing source categories, which will lead to a more effective series of rulemakings. If you have questions regarding this questionnaire, please contact Andrew Bouchard in EPA's Refining and Chemical Group at 919-541-4036 or Bouchard.Andrew@epa.gov.

Sincerely,

Penny Lassiter
Director
Sector Policies and Programs Division

6 Enclosures

cc: Debra Shore, Regional Administrator, EPA Region 5
John Mooney, EPA Region 5
Margaret Sieffert, EPA Region 5
Jeff Robinson, EPA Region 6
Tonya Baer, Texas Commission on Environmental Quality
Celena Cage, Louisiana Department of Environmental Quality
Mary Ann Dolehanty, Michigan Department of Environment, Great Lakes, and Energy