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west virginia department of environmental protection

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Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

Austin Caperton, Cabinet Secretary  
dep.wv.gov

January 6, 2020

Ms. Cristina Fernandez  
Director, Air and Radiation Division, Regional Administrator  
U.S. EPA, Region III (3AD00)  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Request to prioritize regulatory re-evaluation and update of Polyether Polyols Production NESHAP (40 CFR 63, Subpart PPP) to reduce Ethylene Oxide Emissions

Dear Ms. Fernandez:

The West Virginia Department of Environmental Protection (WVDEP) is formally requesting the United States Environmental Protection Agency (EPA) prioritize a regulatory re-evaluation and update of the Polyether Polyols Production National Emissions Standard for Hazardous Air Pollutants (40 CFR 63, Subpart PPP NESHAP) to further reduce emissions of ethylene oxide (EtO) to atmosphere as soon as practicable.

EPA's updated EtO cancer unit risk factor as used in the 2014 National Air Toxics Assessment (NATA), along with data available from national monitoring efforts over the last six months, indicate that the human health impact from long term inhalation exposure is unacceptable. While the Polyether Polyols Production NESHAP has been fully implemented under the 1990 CAA, including the residual risk and technology review, it is important that EPA re-evaluate the human health risks remaining based on its own latest information to determine whether they are acceptable; what further emissions reductions must be achieved from which processes or work practices; and on what timeline.

EPA's 2014 NATA identified several facilities in West Virginia as contributing to elevated risk based on EtO emissions. These facilities are operating in compliance with state and federal regulations, including the existing Polyether Polyols Production NESHAP in several instances. WVDEP is working with these facilities to obtain more detailed and updated emissions data and plans to perform site-specific air dispersion modeling. As you know our respective staffs continue to work together on the ethylene oxide emissions issue. WVDEP is committed to staying engaged nationally as EPA works to establish updated standards to protect human health.

Promoting a healthy environment.

Letter to Cristina Fernandez

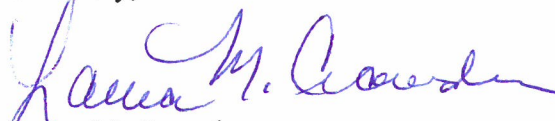
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Thank you for your time and attention to this matter. Please do not hesitate to contact me with any questions or concerns. I can be reached at (304) 926-0499, ext. 1238 or [Laura.M.Crowder@wv.gov](mailto:Laura.M.Crowder@wv.gov). Or you may contact Renu Chakrabarty at (304) 926-0499, ext. 1246 or [Renu.M.Chakrabarty@wv.gov](mailto:Renu.M.Chakrabarty@wv.gov).

Sincerely,



Laura M. Crowder  
Director

cc: via email  
Alice Chow, EPA Region 3  
Renu Chakrabarty, DAQ