

## FACT SHEET

### Request for an Alternative Means of Emission Limitation at Rohm and Haas Chemicals LLC, a subsidiary of The Dow Chemical Company (Dow)

#### **Action**

- The U.S. Environmental Protection Agency (EPA) is requesting comments on an alternative means of emission limitation (AMEL) request for the Standards of Performance for Volatile Organic Liquid Storage Vessels that would apply to a proposed new vinyl acetate bulk storage tank to be used at Rohm and Haas Chemicals LLC, a subsidiary of The Dow Chemical Company (Dow), a chemical plant in Kankakee, Illinois. EPA is taking comment on:
  - all aspects of the AMEL request; and
  - specific operating conditions that Dow should follow to ensure that equivalent emissions reductions are met by this storage tank.
- The Clean Air Act provides the ability for regulated sources to seek approval of an AMEL, which must achieve emission reductions at least as stringent as the existing standards.

#### **Background**

- Rohm and Haas is submitting this AMEL request because the proposed tank design does not contain either an external or internal floating roof or a closed vent system and control device that are specified by 40 CFR 60.112b; rather, it is designed to reduce emissions through vapor balancing and pressure containment.
- The storage tank will achieve at least equivalent emissions reductions as storage tanks complying with the requirements in New Source Performance Standards subpart Kb by following the conditions in this notice.

#### **How to Comment**

- EPA will accept comment on this action for 45 days after publication in the *Federal Register*.
- Comments, identified by Docket ID No. EPA-HQ-OAR-2020-0599, may be submitted by one of the following methods:
  - Go to <https://www.regulations.gov/> and follow the online instructions for submitting comments.
  - Send comments by email: [A-and-R-Docket@epa.gov](mailto:A-and-R-Docket@epa.gov). Include Docket ID No. EPA-HQ-OAR-2020-0599 in the subject line of the message.
- Out of an abundance of caution for members of the public and our staff, the EPA Docket Center and Reading Room are closed to the public, with limited exceptions, to reduce the risk of transmitting COVID-19. Hand deliveries and couriers may be received by scheduled appointment only. Our Docket Center staff will continue to provide remote customer service via email, phone and webform. We encourage the public to submit comments via <https://www.regulations.gov/> or email, as there will be a delay in process mail and no hand deliveries will be accepted.
- For further information on EPA Docket Center services, please visit us online at <https://www.epa.gov/dockets>.

#### **For More Information**

- Interested parties can download a copy of this proposed action from EPA's website at the following address: <https://www.epa.gov/stationary-sources-air-pollution/volatile-organic-liquid-storage-vessels-including-petroleum-storage>.
- Today's action and other background information are also available electronically at <https://www.regulations.gov/>, the EPA's electronic public docket and comment system.
- For further information about this action, contact Ms. Angela Carey of EPA's Office of Air Quality Planning and Standards, at (919) 541-2187 or by email at [Carey.Angela@epa.gov](mailto:Carey.Angela@epa.gov).