

Attachment 1

Response to Comments

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for

Draft Renewal Title V Permit for The Dow Chemical Company

The Dow Chemical Company submitted comments on the draft permit via email on December 15, 2015 and submitted clarifying emails on the comments on December 16, 2015.

The comments are summarized below along with any changes made to the Title V permit.

Comment 1

Dow requested that Table VII-CC for 40 CFR Part 63 Subpart EEE be revised to indicate that scrubber pH monitoring for S-336 Manufacturing Service Thermal Oxidizer and S-389 Sym-Tet Thermal Oxidizer is continuous and not daily.

Response to Comment 1

District staff has revised Table VII-CC for 40 CFR Part 63 Subpart EEE to indicate that scrubber pH is monitored on a continuous basis for S-336 and S-389.

Comment 2

Dow requested that the final Title V permit be revised to indicate that 40 CFR Subpart EEE does not require ongoing Destruction Removal Efficiency (DRE) testing every 5 years, but only an initial demonstration of DRE is required by Subpart EEE. Dow stated that they plan to test S-336 and S-389 for DRE when performing the Comprehensive Performance Testing required by Subpart EEE. Dow stated that the DRE test requirement should be contained in CAM Condition 26192.

Response to Comment 2

District staff has revised the final Title V permit to state that Subpart EEE does not require ongoing DRE testing. The Compliance Assurance Monitoring (CAM) Condition 26192 parts 3 and 8 have been revised to require DRE testing be performed during the Subpart EEE Comprehensive Performance Test. The Comprehensive Performance Test is performed every 5 years in accordance with Subpart EEE. The Table IV-CM for CAM has been revised to show the changes to the CAM Condition 26192. Table VII-CC for Subpart EEE and Table VII-CG for CAM have been revised to address the changes described above. In addition, several typos were corrected in Table VII-CG for CAM (S-336 is subject to Condition 6859 not 6850, S-336 has a minimum temperature requirement of 1745 deg. F not 1807 deg. F).

Comment 3

Dow noted that two versions of Condition 4780 were in the draft permit and stated which version was the latest version of the condition text.

Response to Comment 3

District staff had two versions of Condition 4780 in the draft Title V permit to allow commentors to see the changes to the condition text associated with permit applications processed since the last Title V revision. District staff has removed the old version of Condition 4780 from the final Title V permit.

Comment 4

Dow identified typographical errors in Condition 25675 and CAM Condition 26192.

Response to Comment 4

District staff corrected the typographical errors in Condition 26575 and CAM Condition 26192.

Comment 5

Dow requested that Table VII-A row 1 be revised to remove references to liquid balancing which are not contained in Regulation 8-5-328.1.

Response to Comment 5

District staff removed the references to liquid balancing in Table VII-A row 1 since it is not contained in Regulation 8-5-328.1.

Comment 6

Dow requested that Table VII-A row 2 be revised to remove the Source Test reference from this table entry since it is not in the current version of Regulation 8, Rule 5.

Response to Comment 6

District staff did not revise Table VII-A row 2 since the SIP version of Regulation 8, Rule 5 requires a source test in accordance with Regulation 8-5-502.

Comment 7

Dow requested that Table VII-BF be revised to make the source test frequency consistent throughout the Table. The source test requirement for the VOC limits contained in 8-2-301 and for Condition 4780 part 1 required testing once per permit

term in the Table. The remaining requirements require source testing once every five years.

Response to Comment 7

District staff revised Table VII-AS (formerly VII-BF) to require source testing once every five years for the VOC limit contained in Regulation 8-2-301 and Condition 4780, part 1. The regulation and condition text do not reference the once per permit term language that has been removed from the permit.