



November 22, 2019

VIA EMAIL

Ms. Karen Hays, P.E.
Chief, Air Protection Branch
Environmental Protection Division
Atlanta Tradeport
4244 International Parkway
Atlanta, GA 30354
Karen.Hays@dnr.ga.gov

Re: Stepan Company's Winder, Georgia Facility

Dear Ms. Hays:

Stepan Company's Winder, Georgia facility (the "Facility") is committed to making continuous improvements across its operations to ensure the safety of our employees and Winder community, as well as to protect our environment. This includes our ongoing efforts to reduce Ethylene Oxide ("EO") emissions from the Facility. Thus, the Facility has voluntarily committed to:

- (a) Allocate resources, including additional personnel, for an enhanced leak detection and repair ("LDAR") program to cover components in EO service such as valves, flanges, etc. This LDAR program will reduce calculated emissions.
- (b) Install rupture discs under all pressure release valves in EO service that will further eliminate these calculated EO emissions.
- (c) Validate actual operating conditions for certain processes which will provide more accurate calculations on emissions.
- (d) By the end of February 2020, present to EPD a testing plan for a stack test for the Facility's emission control device.

The Facility believes that these steps will reduce the Facility's EO calculated annual emissions by 41% (from 160 lbs. to 94 lbs.).

We remain focused on the safety of our workers and the Winder community and we look forward to continuing to work with your office to take practical, reasonable steps to further reduce emissions from our Facility.

Sincerely,

Plant Manager
Stepan Winder