Indorama Ventures – Indovinya
PO Box 847 | 2701 Spur 136
Port Neches, TX 77651 USA

http://indovinya.indoramaventures.com

B. An Extension is in the National Security Interests of the United States

As with other exemptions aimed at protecting "the President's effectiveness in carrying out his assigned responsibilities,"[5] the national security element in 42 U.S.C. § 7412(i)(4) should be given a broad construction. With respect to the national security implications of ethylene oxide-related supply chain disruptions, we incorporate the information provided by ACC and AFPM in a letter submitted to EPA earlier today on this topic. We also supplement that submittal with the following additional information:

- The Port Neches Facility employees 600 dedicated associates, with a contract workforce that can total up to 1,000 associates during a turnaround event.
- The Port Neches Facility is the largest domestic producer of ethylene oxide, which is critical for use in the medical sterilization industry, as well as an essential component of products used in daily life such as detergents, textiles, and plastics. Ethylene oxide is also a necessary part of value chains for multiple industries, including agriculture, construction, healthcare, cleaning, transportation, and oil and gas.
- The manufacture of ethylene oxide and ethylene glycol is highly complex and requires specialized production units. The Port Neches Facility has over 50 years of experience safely producing ethylene oxide and ethylene glycol. The operations at the Port Neches Facility are designed to safely use and produce ethylene oxide to minimize risks to human health and the environment.
- The repeated shutdowns required for project implementation and to address elimination of delay of repair discussed above will interfere with safe operation, imposing significant risks and costs not justified by the environmental benefit, contrary to EPA's analysis and subsequent claims and conclusions.
- They also significantly disrupt the supply chain for ethylene oxide and other products which rely on ethylene oxide as a raw material. This would cause ripple effects across the value chains for multiple industries by increasing costs and reducing the availability of goods essential to everyday life, as well as potentially leading to job losses and economic instability.
- These actions are contrary to the President's Executive Order: Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" (February 19, 2025), which directs agency heads to initiate a process to review all regulations for consistency with law and Administration policy, including rules that implicate matters of economic significance, impose significant costs on private parties not outweighed by public benefits, or harm national interest by significantly and unjustifiably impeding economic development/energy production, among others.

Because the technology to implement the HON is not readily available and it is in the national security interests of the United States to do so, Indorama requests that the President grant a two-year extension of the HON under CAA § 112(i)(4) (42 U.S.C. §7412(i)(4)). We

[5] *Colon v. Carter*, 633 F.3d 964, 967 (1st Cir. 1980).

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