

The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated	The date by which on-site construction, installation of emission control equipment, or a process change is to be completed	The date by which final compliance is to be achieved.
October 1, 2024	March 31, 2029	March 31, 2029

Within this compliance schedule, Indorama anticipates Phase I engineering to begin October 1, 2024, with an estimated Phase I completion date of Q1 2025; Phase II engineering is expected to begin Q1 2025 and complete 2Q 2025; Phase III engineering is expected to begin 3Q 2025 and complete 3Q 2026; detailed design is expected to begin 3Q 2026; construction is expected to begin 1Q 2027; with construction to be completed 1Q 2029.

As noted above, Indorama is currently engaged in the planning and implementation of the Emission Control Projects, including discussions with outside vendors and consultants. The dates provided herein are preliminary estimates based on Indorama's current knowledge of facility operations and past experience implementing similar control measures. Although the estimates provided below are good faith approximations of the time necessary, these projects could take significantly longer to implement. Indorama makes no commitment to meet these preliminary minimum estimates.⁶

III. Extending the compliance period will not risk imminent endangerment at or near the Port Neches Facility.

In conducting the residual risk assessment in Final Rule, EPA assessed each regulated facility to determine whether it posed unacceptable risk. *See generally* 89 Fed. Reg. at 42,955-56. EPA determined that the Port Neches Facility posed unacceptable residual risk based on its emissions of ethylene oxide, a calculation that was driven by the unrealistically low risk value for ethylene oxide, the 2016 IRIS value.⁷ Specifically, the risks from the source category were primarily driven by ethylene oxide emissions from PRDs, which contributed 74% of the risk to those emissions. *See* 89 Fed. Reg. at 42,956. But as Indorama explained in its comment on the proposed rule, the PRDs at the Port Neches facility release only during abnormal, excess pressure circumstances when immediate depressurization is required for safety reasons; such emissions are already subject to regulation and are inappropriate to consider for the purposes of assessing cancer risk because they do not represent chronic exposures. *See* EPA-HQ-OAR-2022-0730-0152 at 11-18. The PRDs at the Port Neches Facility function only when depressurization is critical to prevent catastrophic equipment failure that could result in significant safety hazards for workers. These PRDs do not operate during normal, day-to-day operations, meaning the bulk of the risk

⁶ Indorama recognizes that these estimates extend beyond the extended deadline available under 42 U.S.C. §7412(i)(3). While Indorama will endeavor to reduce the implementation period, Indorama's good faith estimates indicate that, while the requested extension is justified, additional relief from the Final Rule's unachievable compliance deadlines may be needed. Indorama therefore reserves the right to seek such additional relief from the Final Rule's compliance deadlines as may be available under the law, both concurrently and following this request.

⁷ EPA, *Evaluation of the Inhalation Carcinogenicity of Ethylene Oxide (CASRN 75-21-8) In Support of Summary Information on the Integrated Risk Information System (IRIS)* (December 2016)