

Summary of Opinions

3. Based on several years of intensive investigation by DPE assessing the prospect of reducing the emissions of chloroprene from DPE's Facility and my extensive experience safely planning and implementing emissions reduction projects ("ERPs") at the Facility, I am certain that the Section 112(f) Control Projects cannot be implemented within a 90-day compliance period. I offer the following specific opinions on this point:

- **Opinion 1:** Safely completing the Section 112(f) Control Projects at the Facility, including design and planning of the required modifications, capital approval, procurement and fabrication, installation, and testing of equipment, cannot be done in 90 days and will require at least two years.
- **Opinion 2:** A compliance period of less than two years would likely require a shutdown of the Facility and increase the complexity and dangers of implementing the requirements.
- **Opinion 3:** DPE has continued to reduce emissions through practicable, safe, and effective emissions reduction strategies since May 2022. DPE plans to continue to implement such strategies during the compliance period.
- **Opinion 4:** Section 112(f) Control Projects will impose significant capital and operating costs on the Facility and will require approvals and authorizations prior to initiating.

reviewing the technical documents, but I do not believe they would change my conclusion as to the feasibility of the 90-day compliance period.