

- This increased shutdown and startup frequency raises several technical concerns for which the HON presents no available technology to address:
 - If Indorama had to shut down production units at least twice per month, emissions from those shutdowns would far exceed emissions if those leaking components were maintained at status-quo until the next scheduled unit shutdown for maintenance and inspection.
 - Frequent shutdowns increase the risk of upsets due to significant changes in pressure and temperature during the shutdown/startup cycles.
 - Due to the complexity of the ethylene oxide production processes, when a unit shutdown is required to repair equipment in ethylene oxide service (e.g., valves, connectors, pumps, compressors, etc.) there are ripple effects throughout the plant. Such shutdowns can be complex, involve multiple process units other than the unit in which the leaking component is located, and potentially result in additional emissions. On-site units that supply raw material to the ethylene oxide units, such as ethylene, are interconnected with the ethylene oxide production units. Also, on-site units that receive ethylene oxide, such as the glycol units, are interconnected with the ethylene oxide production units. Depending on the location of the leaking component in the ethylene oxide production area, these on-site providers of raw materials and receivers of the ethylene oxide and glycols produced may have to shut down as well, which could increase emissions from non-HON regulated units.
 - Frequent startups and shutdowns introduce safety risks, particularly for units that use and produce a volatile substance such as ethylene oxide. If not properly purged, stagnant ethylene oxide can polymerize and combust. Requiring more frequent shutdowns also increases wear and tear on equipment, which could result in a shorter asset life for critical equipment.
 - Repeated shutdowns would significantly disrupt the supply chain for ethylene oxide and other products which rely on ethylene oxide as a raw material.

Fenceline Monitoring

- In the final rule, EPA imposed fenceline monitoring requirements that are technically infeasible and will be extremely costly, with no discernable risk reduction. The requirements also improperly force Indorama to act as a regulator and investigate exceedances that may not be attributable to the Port Neches Facility.
- The Final Rule imposes fenceline monitoring obligations that require the Port Neches Facility to conduct air sampling and take corrective action when recorded ethylene oxide levels exceed 0.11 ppb. This is an unprecedented and infeasibly low detection level.
- The Final Rule requires use of a new canister sampling method that has not been widely used in field monitoring. During the information request period prior to rule proposal, several of the participants, including Indorama, experienced multiple analytical errors and data invalidations due to co-elution, interferences, sample contamination, and