

A. *Emission Control Projects*

Indorama will need to implement the Emission Control Projects described below to comply with the Final Rule.

1. Flare system

The Final Rule requires that the process vents and tank vents in ethylene oxide service at the Port Neches Facility be controlled. At this time it appears as though a new steam-assisted flare system would satisfy the control requirements. See 40 CFR 63.119(a)(5); 40 CFR 63.113(j). Sourcing, scoping, and engineering of a suitable flare system will require significant time. Indorama will also be required to obtain new permits for the flare system, a process that is expected to take at least 12 months.

2. Wastewater treatment system

The Final Rule reduced the Group 1 wastewater threshold from 1000 parts per million ("ppm") to 1 ppm ethylene oxide concentration. See 40 CFR 63.101. This change will require the Port Neches Facility to install a new wastewater treatment system requiring containment of all open streams and installation of vapor control technologies. This project will require extensive scoping, engineering, and physical and process changes as well as additional permitting.

3. PRD safeguards

The Final Rule imposes a work practice standard for PRDs that vent to the atmosphere that requires owners and operators to implement at least three prevention measures, perform root cause analysis and corrective action in the event that a PRD does release emissions directly to the atmosphere, and monitor PRDs using a system that is capable of identifying and recording the time and duration of each pressure release and of notifying operators that a pressure release has occurred. See 40 CFR 63.165(e).⁵ Compliance will require Indorama to install triple-redundancy safeguard systems and process monitoring devices for each affected PRD. The type of specialized monitoring devices required by the Final Rule will require significant time to source and obtain.

B. *Compliance Schedule*

Indorama's engineering team has undertaken significant efforts to harmonize a compliance schedule under which all Emission Control Projects will be in progress simultaneously. Accordingly, the below schedule applies to all Emission Control Projects described above:

⁵ EPA imposed these PRD requirements under 112(d). Given the fact that there is sufficient information now to support an extension under the 42 U.S.C. § 7412(i)(3)(B) (see also 40 CFR 63.6(i)(4)(i)) Indorama is including PRD safeguards in this request. Indorama 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.