

attributable to the facility's emissions do not result from normal operations and a compliance extension will not result in imminent endangerment at or near the Port Neches Facility.⁸

Further, the Port Neches Facility will be implementing the Emission Control Projects as expeditiously as possible, as described above, while continuing to operate according to Indorama policies that are intended to ensure the facility operates safely and protects the health of the community and environment. Indorama has already implemented policies to minimize the risk of reoccurrence of the PRD releases that occurred during the time period EPA considered in assessing risk from the Port Neches Facility, in particular, by improving the process for startups and shutdowns to ensure consistently safe pressure conditions. Therefore, in addition to the fact that normal operations do not result in imminent endangerment, Indorama has and will continue to take steps to further assure there will be no risk of imminent endangerment if a compliance extension is granted.

IV. Conclusion

As set forth herein, an extension of the compliance period set by the Final Rule is necessary for the installation of controls and will not risk imminent endangerment to any persons. Indorama respectfully requests an extension of the compliance period for the Emission Control Projects until July 15, 2028.

⁸ The effect of the Final Rule on PRDs is that any release to the atmosphere is considered a violation, but since, as described here, the PRDs operate only for safety reasons to immediately depressurize, it is not possible to connect the Port Neches Facility PRDs to control devices. Thus, the Final Rule will not reduce emissions from PRDs at the Port Neches Facility, as explained in comments. See EPA HQ OAR-2022-0730-0152 at 33-34.