

documents, third-party vendor quotes for emission control equipment, extensive emissions control experience, and Facility site visits, many of which I personally led.

6. As the Environmental Affairs Manager of a complex chemical manufacturing facility, after reviewing the extensive analyses by DPE personnel and outside consultants, I have serious concerns regarding the numerous complex process changes that will be required at the Facility for the installation of the Section 112(f) Control Projects. Chloroprene is a highly volatile, flammable, and highly reactive (polymeric) chemical. In turn, any changes to the production process at the Facility will require properly trained and knowledgeable employees and contractors with process safety experience. Failure to follow process safety procedures can result in disastrous consequences such as fires, explosions, and fatalities, as well as unintended environmental releases. Probability of incidents such as these is increased by stressors such as human error and omissions which are more likely to happen if new complex safety processes are implemented on an accelerated timeline, as is required in the Final Rule. Avoiding the consequences associated with potential chloroprene-related process safety failures will demand careful planning and sufficient time to develop, assess, and implement the appropriate procedures required to safely operate the Section 112(f) Control Projects.

7. As the Environmental Affairs Manager, I have substantial concerns that the design, installation, and testing of the major projects required to comply with the Final Rule, combined with the requirement to complete these projects in a 90-day or even a two-year window, will encourage personnel to rush standard industry processes and practices, and increase the probability of human error. Circumvention of these standard processes and practices can easily result in a violation of the Occupational Safety and Health Administration's (OSHA) Process Safety Management requirements, serious injury or death to employees, and increased risk of community