

American Fuel & Petrochemicals Manufacturers ("AFPM") detailing the critical nature of ethylene oxide ("EO") as a building block to several supply chains throughout domestic manufacturing, and the potential risks to our nation's national security interests if continued production is jeopardized.

While the Administration already possesses extensive information (including prior comments and the underlying petition for reconsideration on the HON Rule) supporting issuance of this exemption, this letter provides additional details regarding the time-critical nature of this request for relief and related responses to EPA's information requests.

I. Individual Facility Information

Per EPA's guidance,⁴ Indorama submits the following requested information:

- *The emissions standards or limitations subject to the request,*

Indorama requests extension of the national emission standards for hazardous air pollutants promulgated on March 16, 2024 and commonly referred to as the HON. Given the complex interweaving of requirements in the HON, it is more appropriate to extend the HON standards collectively. However, to the extent EPA seeks to list individual emission standards or limitations within the HON, the following should be extended, along with their associated monitoring, reporting, and recordkeeping requirements:

Requirements that Process Vents and Tank Vents in Ethylene Oxide Service be Controlled

- 40 CFR 63.101
- 40 CFR 63.108(a)
- 40 CFR 63.113(a)(1) and (2)
- 40 CFR 63.113(j)
- 40 CFR 63.113(k)
- 40 CFR 63.119(a)(5)
- 40 CFR 63.124
- 40 CFR 63.114(d)(3)
- 40 CFR 63.148(f)(4)

Pressure Relief Devices

- 40 CFR 63.165(e)(3)
- 40 CFR 60.612a(b)(2)
- 40 CFR 60.662a(b)(2)
- 40 CFR 60.702a(b)(2)

⁴ See <https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information> (last visited March 24, 2025).