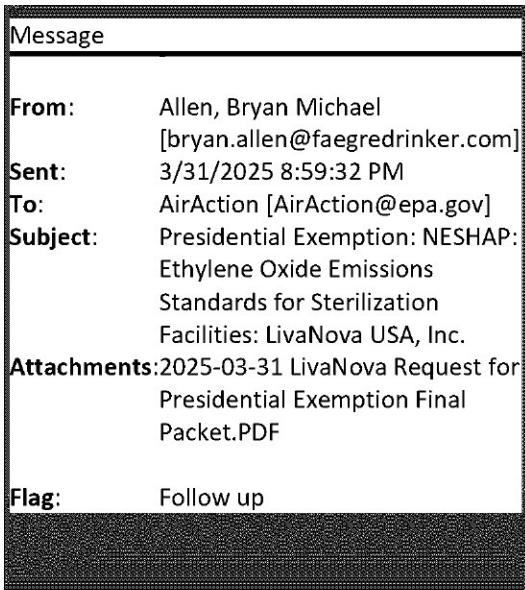


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Dear EPA,

Please find attached a formal request on behalf of LivaNova USA, Inc. for a two-year exemption from the Ethylene Oxide Emissions Standards for Sterilization Facilities, as outlined in Section 112(i)(4) of the Clean Air Act.

Facility Information:

- Facility Name: LivaNova Arvada Facility
- Facility Address: 14401 W 65th Way, Arvada, CO 80004

Emissions Standards or Limitations Subject to the Request:

- "National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review", 40 CFR Part 63, Subpart O (89 FR 24090; April 5, 2024) (Sterilizer Rule)

Length of Compliance Period Being Requested:

- 2-year exemption from April 6, 2026, to April 6, 2028.

The attached request includes justifications based on the unavailability of required technology and the national security interests of the United States, and an appropriate delegation of authority from LivaNova to submit this request on their behalf. The attached letter does not include any proprietary information. However, such information may be available if deemed necessary by the EPA, which can be submitted in accordance with applicable rules and regulations to protect confidential business information.

Please do not hesitate to contact us if you require any additional information or steps to process this request.

Kind regards,

Bryan M. Allen

Senior Manager - Federal Policy & Consulting

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