

Celanese Corporation
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March 31, 2025

U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Presidential Exemption: [New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry]: Narrows (Virginia), Clear Lake (Texas), Bishop (Texas), and Bay City (Texas) Facilities

To Whom It May Concern,

The Celanese Corporation (Celanese) requests a two-year exemption from compliance obligations of the New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry (collectively referred to as the HON Rule).¹ For the reasons highlighted in this letter, we believe it is necessary and appropriate for the President to grant an exemption under Clean Air Act (CAA) Section 112(i)(4) for sources regulated by the final rule either on an individual basis or collectively. We request that the U.S. Environmental Protection Agency (EPA) include our regulated facilities under that action.

We urge the Administration to swiftly consider and issue such an action based on an understanding that both: 1) “availability” for the purposes of this section refers not only to the existence of technology capable of achieving compliance with the rule, but encompasses practical challenges with the timeframes necessary to plan, procure, and install required technologies and such activity cannot occur within the current compliance timeframe; and 2) national security encompasses not only military defense applications and infrastructure, but also economic security, a perspective that has been acknowledged by the President in Executive Orders and key security agencies like the Department of Defense. Indeed, as the White House has stated regarding domestic priorities, “economic security is national security.”² As additional support on this point, we reference the separate joint coalition submission sent to EPA from the

¹ National Emissions Standards for Hazardous Air Pollutants (NESHAP), Powering the Great American Comeback https://www.epa.gov/system/files/documents/2025-03/neshap_powering-the-great-american-comeback_fact-sheet_3-10-25.pdf, 89 Fed. Reg. 42932 (May 16, 2024).

² *America First Investment Policy*, <https://www.whitehouse.gov/presidential-actions/2025/02/america-first-investment-policy/> (Feb. 21, 2025).