



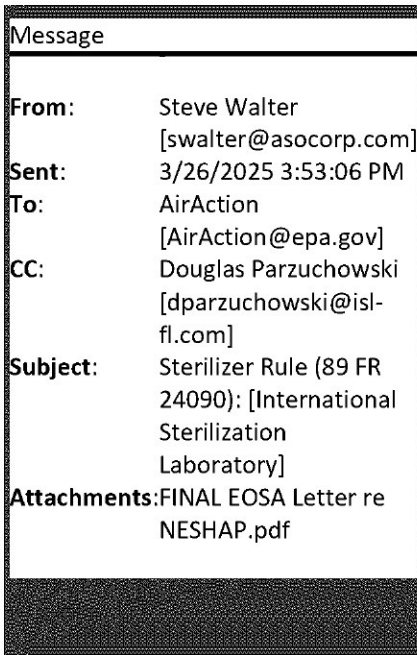
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To Whom It May Concern,

Enclosed is a request for Presidential Exemption under the Clean Air Act Section 112 for:

Shell Chemical LP
Geismar Plant
Geismar, Louisiana

Sincerely,
Jim Schulze
Shell Chemical LP



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To: airaction@epa.gov

Re: Sterilizer Rule (89 FR 24090): International Sterilization Laboratory

I write on behalf of [International Sterilization Laboratory] to request that the President issue a two-year exemption pursuant to his authority under CAA Section 112(i)(4) for all emission standards and associated requirements set or revised in EPA's April 4, 2024 *National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review*, 89 FR 24090 (April 5, 2024) (Sterilizer Rule).

International Sterilization Laboratory requests that the Presidential Exemption apply to the following facilities regulated by the Sterilizer Rule and all sources therein:

- International Sterilization Laboratory, 217 Sampey Road, Groveland, Florida, 34736

International Sterilization Laboratory requests that the President issue a two-year exemption as quickly as possible, but designate it as taking effect on the compliance deadlines for the standards in the Sterilizer Rule. Specifically:

- For standards set or revised under CAA Section 112(f) and all corresponding requirements (including monitoring requirements), the exemption should apply as of April 6, 2026 (the compliance deadline for those standards);
- For standards set or revised under CAA Section 112(d) and all corresponding requirements (including monitoring requirements), the exemption should apply as of April 5, 2027 (the compliance deadlines for those standards).

As explained further in the attached letter submitted to EPA on March 17 on behalf of the Ethylene Oxide Sterilization Association (EOSA), the technology necessary to implement the standards is not available because manufacturers cannot guarantee that existing emissions control equipment will enable sources to meet the new standards; there is not a sufficient supply of the necessary technology; and there are not enough experienced installation professional and technical experts to install and test that equipment within the current compliance timeframes.