

Decatur, AL 35601	Alabama Department of Environmental Management	• Process Vents: 40 C.F.R. §§ 63.113 to 118 • Storage Vessels: 40 C.F.R. §§ 63.119 to 123 • Notification & Reporting: 40 C.F.R. §§ 63.151 to 152 • Pressure Relief Devices: 40 C.F.R. § 165(e) • Fenceline Monitoring: 40 C.F.R. § 63.184(a)(1)
2. Ascend Alvin: Monsanto Rd FM 2917 Alvin, TX 77511	Title V Permit Nos. 2321 & 2324 Texas Commission on Environmental Quality	• Flares: 40 C.F.R. §§ 63.107 & 108 • Process Vents: 40 C.F.R. §§ 63.113 to 118 • Storage Vessels: 40 C.F.R. § 63.119 to 123 • Notification & Reporting: 40 C.F.R. § 63.151 to 152 • Pressure Relief Devices: 40 C.F.R. § 165(e) • Fenceline Monitoring: 40 C.F.R. § 63.184(a)(1)
3. Ascend Pensacola: 3000 Old Chemstrand Rd Cantonment, FL 32533	Title V Permit No. 0330040-077-AV Florida Department of Environmental Protection	• Flares: 40 C.F.R. §§ 63.107 & 108 • Process Vents: 40 C.F.R. §§ 63.113 to 118 • Storage Vessels: 40 C.F.R. §§ 63.119 to 123 • Notification & Reporting: 40 C.F.R. §§ 63.151 to 152 • Pressure Relief Devices: 40 C.F.R. § 165(e) • Fenceline Monitoring: 40 C.F.R. § 63.184(a)(1)

II. Justification for Presidential Exemption

A. The Technology to Implement the Above Standards Is Not Available

In addition to this request for a Presidential exemption under CAA § 112(i)(4), Ascend also plans to submit requests for compliance schedules for existing sources under CAA § 112(i)(3) for the three facilities identified above. To meet the aggressive deadlines of the HON Rule, Ascend would have had to initiate feasibility assessments and initial design for the control projects well before the Final Rule was even published. None of these projects has a realistic prospect of completion pursuant to the HON Rule's current compliance deadlines.