

CERTIFIED MAIL NO. 7020 1290 0002 0958 9673
RETURN RECEIPT REQUESTED

March 31, 2025

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

Also submitted electronically to: airaction@epa.gov

Subject: Presidential Exemption: [New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and Group I & II Polymers and Resins Industry]: [Lotte Chemical Louisiana LLC]

To Whom It May Concern:

Lotte Chemical Louisiana LLC (LCLA) is subject to New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) (collectively referred to as the HON rule). As such, LCLA requests an exemption from the compliance obligations of the new ruling which came into effect May 16, 2024. LCLA believes it is 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. For single-facility exemption or an all regulated facilities exemption, LCLA requests to be included under those actions. The below comments provide justification for LCLA to be included in exemption action.

- "An explanation why the technology to implement the standard is not available"

Availability of the technology also encompasses the challenges that comes with the timeframe necessary to develop the technology, as well as plan, procure and implement the technology behind the rule, especially surrounding fenceline monitoring.

As the rule is currently written, LCLA would require fenceline monitoring for Ethylene Oxide (EO) as well as Benzene and 1,3-Butadiene. The rule states this monitoring shall begin no later than July 15, 2026, with root cause investigations, corrective actions, and real-time monitoring requirements coming into effect a year later. As of this letter, there are few laboratories, if any, that can fully meet the stringent requirements of Method 327 for EO canister monitoring. There are also concerns about supply issues for all the additional canisters, flow controllers, passive tubes, etc. that will be needed for all facilities now subject to this rule.

It will take significant time for the facility to do pilot studies, bid out and select monitoring contractors, develop site specific monitoring plans, develop monitoring program as well as for