



Via electronic mail to airaction@epa.gov

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 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]: DuPont Specialty Products USA, LLC – Pontchartrain Site, Diamine Unit

To Whom It May Concern,

DuPont Specialty Products USA, LLC ("DuPont") requests an exemption from the compliance obligations of the 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 (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. If done collectively, we request that EPA include our regulated facilities under that collective action.

We urge the Administration to swiftly consider and issue such an action based on an understanding that "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.

We believe that the Administration has already been provided with sufficient information (including prior comments and the underlying petition for reconsideration on the HON rule) to support an exemption covering all regulated facilities or on a facility-specific basis. This letter provides additional detail and support on the time-critical nature of the request for relief and to address EPA's request for information. We submit both in support of a category-wide grant, as well as to provide company-specific information if the President pursues a facility-specific exemption action.

DuPont operates a diamine unit at the Pontchartrain Site in Laplace, Louisiana. This facility is regulated under 40 CFR Part 63, Subparts F, G, and H, which establish National Emission Standards for Hazardous Air Pollutants (HAPs) from the Synthetic Organic Chemical Manufacturing Industry for process vents, storage vessels, transfer operations, and wastewater (HON). The emission sources impacted by the final rule amendments effective July 15, 2024,

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_2.pdf 89 Fed. Reg. 42932 (May 16, 2024).

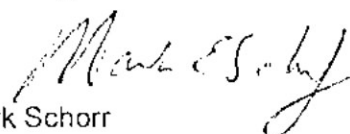
include flares and non-flare control devices, pressure relief devices (PRDs), process vents, storage tanks, and fenceline monitoring. Key reasons for requesting additional time to comply with the new requirements include:

1. **Flares and Monitoring Requirements:** Flares must be equipped with composition monitors or direct net heating monitors. The facility operates multiple flares and is assessing various options to comply with the flare management requirements. These options may include combining vent streams to reduce the total number of flares, replacing the current flares with alternative air pollution control technologies, or installing the required monitoring equipment on each flare as outlined in the 2024 rule amendments. Each of these options will necessitate time for feasibility studies and the capital project implementation process.
2. **Pressure Relief Devices (PRDs) Monitoring:** PRDs vented to the atmosphere are required to have a monitor that provides immediate alerts to operators in the event of a release, as well as three (3) redundant prevention measures. The facility has more than twenty (20) PRDs vented for safety purposes. While there are currently monitors in place for detecting releases, system upgrades or additional monitoring devices may be needed to comply with recordkeeping, reporting requirements, and the specified redundant measures. In some instances, these upgrades may necessitate a temporary shutdown of equipment. The additional time requested will facilitate improved planning to minimize disruptions to regular production.
3. **Fenceline Monitoring for Hazardous Air Pollutants (HAPs):** Fenceline monitoring standards require surveillance for six specific HAPs (benzene, 1,3-butadiene, ethylene dichloride, vinyl chloride, ethylene oxide, and chloroprene). The facility will need to install monitoring systems around its perimeter to detect leaks of benzene and 1,3-butadiene. Given that the facility is adjacent to another facility that also processes these chemicals, the requested additional time will allow both facilities to collaborate on developing an effective monitoring strategy to accurately identify emissions of the targeted HAPs.

For these reasons, DuPont is requesting a 2-year extension to comply with the relevant requirements outlined in 40 CFR 63 Subparts F, G, and H. If granted, this extension will provide DuPont with the necessary time to conduct feasibility studies and evaluate options to meet the new regulations while minimizing the impact on resources and operations.

If additional information is needed, please contact Corey Blanchard at (985) 224-1661 or email at corey.w.blanchard@dupont.com.

Sincerely,



Mark Schorr
Plant Manager

March 31, 2025

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cc: Aaron Szabo, Senior Advisor to the Administrator, Office of the Administrator
Abigale Tardif, Principal Deputy Assistant Administrator, Office of Air and Radiation
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