



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 (NSPS) 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

To Whom It May Concern:

The Vinyl Institute, Inc. (VI)¹ respectfully requests a two-year Presidential exemption from compliance with certain provisions 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)² pursuant to Section 112(i)(4) of the Clean Air Act.³ As discussed further in this letter, VI submits that an exemption is appropriate and warranted not only because it meets the requirements of Section 112(i)(4), but because it advances President Trump's agenda of assuring domestic manufacturing, increasing employment, and safeguarding the broader economy.

Section 112(i)(4) of the Act empowers the President with the authority to provide a compliance exemption from a Section 112 maximum achievable control technology (MACT) standard on grounds that the necessary control technology is not available, and that the exemption is in the national security interest of the United States. Specifically, the Act states that:

The President may exempt any stationary source from compliance with any standard or limitation under this section for a period of not more than 2 years if the President determines that the technology to implement such standard is not available and that it is in the national security interests of the United States to do so. An exemption under this paragraph may be extended for 1 or more additional periods, each period not to exceed

¹ The Vinyl Institute (VI), established in 1982, represents the leading producers of vinyl chloride and other monomers, vinyl resins, and ingredient and additive producers for vinyl compounds. The VI serves as the collective voice for the vinyl industry. More information can be found at www.vinylinfo.org.

² 89 Fed. Reg. 42,932 (May 16, 2024).

³ 42 U.S.C. § 7412(i)(4).