

well as fungi, yeasts, and spore formers. It is also used as a fumigant to control insects in the storage and transport of grain, seeds, and nuts.

- Agriculture: EO derivatives are used in agricultural products to help protect crops and boost crop production. It is used to produce active ingredients in insecticides, pesticides, and herbicides. It is also used to produce surfactants (wetting agents) and dispersants which reduce the amount of pesticides, insecticides, and herbicides required in agriculture and enhances the effectiveness of the application of those products.

The HON Rule and its technically infeasible requirements will result in facility shutdowns, imperiling jobs, and threatening supply chains for a vital chemical building block critical to our national security. The substantial risk of multiple shutdowns combined across HON facilities could result in a massive strain on domestic supply of chemicals that are critical to national security and central to the U.S.'s strategic position in the global economy in key markets.

Without immediate intervention, such as a Presidential exemption under CAA Section 112(i)(4) to extend the compliance deadline for two years or, in the alternative, a compliance extension under CAA Section 112(i)(3), and an interim final rule rescinding those regulatory requirements not based on the best reading of CAA section 112(f), companies will evaluate whether to shut down units or offshore their operations to prevent the application of an imprudent and unlawful rule.

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ACC and AFPM appreciate this opportunity to request a two-year compliance extension for all sources subject to the HON Rule. If you have questions or need more information, please do not hesitate to contact Leslie Bellas at lbellas@afpm.org or Brendan Mascarenhas at Brendan.Mascarenhas@americanchemistry.com.

Sincerely,



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