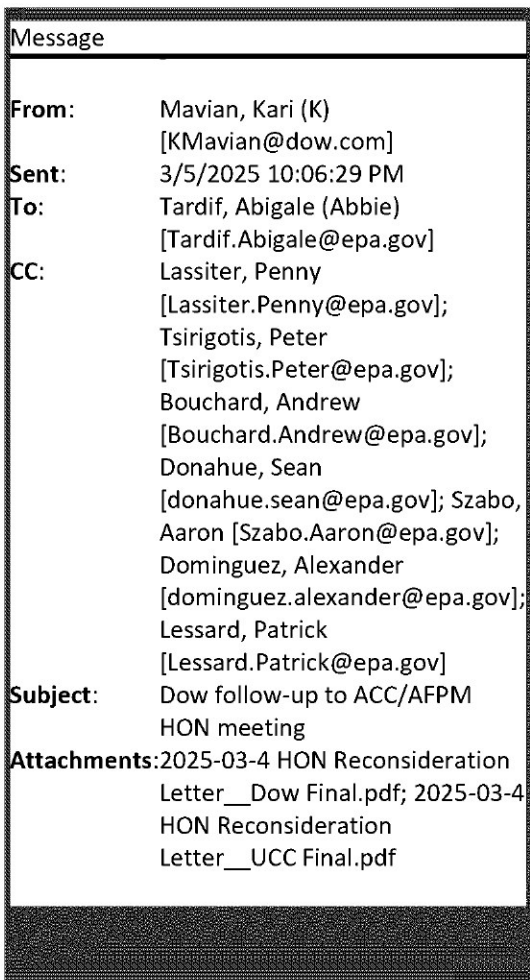




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Dear Principal Deputy Assistant Administrator Tardif,

Please find attached two follow-up letters from Dow and Dow's subsidiary, Union Carbide, reiterating our immediate request for an extension of the compliance date for the HON. Thank you again for meeting with us in February to discuss this rule and the urgent nature of this request. As we mentioned in our meeting, and in our comments and meetings with EPA during the HON rulemaking process, the two-year compliance deadline is not practical for the types of projects needed to comply with this rule. That has been confirmed by our project teams and further detailed in the attached letters. In addition, we express support for the ACC and AFPM petition for reconsideration due to the technically unachievable requirements in the final rule, also further detailed in the attachments.

Please contact me with any questions or information you may need to assist with this request. Thank you for your attention to this.

Best regards,
Kari

Kari Mavian
Global Director of Regulatory Advocacy and Policy

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Sierra Club FOIA Request:
2025-EPA-04193

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General Business