

March 31, 2025

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
9589 0710 5270 1218 8504 53

U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
Email submission: airaction@epa.gov

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: Westlake Chemical OpCo LP (Westlake Petrochemical Complex) & Westlake Styrene LLC (Styrene Monomer Production Facility & Styrene Marine Terminal), subsidiaries of Westlake Corporation, ("Westlake")

To Whom It May Concern,

Westlake is seeking an exemption from the compliance obligations of the New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and the 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 known as the HON Rule. 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 whether on an individual basis or collectively. If done collectively, we request that EPA include our regulated facilities under that collective action.

Westlake encourages the Administration to swiftly consider and issue such an action based on an understanding that both: 1) "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; and 2) national security encompasses not only military defense applications and infrastructure, but also economic security, a perspective that has been acknowledged by the President in Executive Orders and key security agencies like the Department of Defense. Indeed, as the White House has stated regarding domestic priorities, "economic security is national security."¹

Given the practical challenges associated with the planning, procurement, and installation of technologies within the current compliance timeframe, and considering the Administration's stance on economic security as a facet of national security, we believe it is both necessary and appropriate for the President to grant an exemption under Clean Air Act Section 112(i)(4). This exemption is sought for our regulated Westlake Petrochemical Complex, Styrene Monomer Production Facility, and Styrene Marine Terminal.

¹ <https://www.whitehouse.gov/presidential-actions/2025/02/america-first-investment-policy/>.