



March 31, 2025

VIA ELECTRONIC CORRESPONDENCE

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

RE: Presidential Exemption Request From 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 (the HON rule) as applicable to BASF Corporation facilities Located In Geismar, LA, North Geismar, LA and Freeport, TX

To Whom It May Concern:

BASF Corporation hereby requests a **two year** exemption from the 2024 amendments to 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

Pursuant to Section 112(i)(4) of the Clean Air Act, 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: (1) the technology to implement such standard is not available and (2) that it is in the national security interests of the United States to do so.

Two-Year Extension Requested

BASF is required to comply with the stringent new amendments to the HON rule by July 2026, which is simply an unrealistic timeframe to comply with the extensive new requirements

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).