



March 31, 2025

United States Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Request for Presidential Exemption – Clean Air Act Section 112(i)(4)
National Emission Standards for Hazardous Air Pollutants (NESHAP) for the
Synthetic Organic Chemical Manufacturing Industry (SOCMI) – HON Regulation –
40 CFR 63 Subparts F, G, and H
Union Carbide Corporation - Seadrift, Texas site
Title V Operating Permit No. O2031 – Glycol Ethers and Oxide Derivatives Plants
TCEQ RN102181526; CN601688781
Submitted via e-mail to: airaction@epa.gov

To Whom It May Concern,

Union Carbide Corporation ("UCC"), a wholly owned subsidiary of The Dow Chemical Company (Dow) requests a Presidential exemption from compliance obligations of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) also referred to as the HON Rule.¹ For the reasons highlighted in this letter and attachment, 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 either on an individual basis or collectively. If done collectively, we request that EPA include this regulated facility under that collective action.

We urge 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".² As additional support on this point, we reference the separate joint coalition submission sent to EPA from the American Chemistry Council (ACC) and the American Fuel & Petrochemicals Manufacturers (AFPM) detailing the critical nature of ethylene oxide as a building block to several supply chains throughout domestic manufacturing, and the potential risks to our nation's national security interests if continued production is jeopardized.

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).

² <https://www.whitehouse.gov/presidential-actions/2025/02/america-first-investment-policy/>.