



March 31, 2025

VIA ELECTRONIC SUBMISSION

Elite Spice Inc.  
7151 Montevideo Rd.  
Jessup, MD 20794  
410-796-1900

RE: Presidential Exemption: National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review” (89 FR 24090; April 5, 2024) (Sterilizer Rule)

To whom it may concern:

Elite Spice, Inc. appreciates the opportunity to submit a request for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for the National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review” (89 FR 24090; April 5, 2024) (Sterilizer Rule).

Elite Spice, Inc. is a privately-held, American-owned spice and seasoning manufacturer headquartered in Jessup, Maryland. With over 35 years of experience in processing spices for the food industry, we are committed to maintaining the highest standards of food safety. Our mission is to supply pure, safe, and wholesome spices to the commercial food manufacturing industry.

**Emissions standards or limitations subject to the request:** National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review” (89 FR 24090; April 5, 2024) (Sterilizer Rule)

**Facilities and affected sources:** Elite Spice operates three facilities—two in Maryland and one in Nevada—where we utilize ethylene oxide to sterilize spices, ensuring their safety and quality for our customers.

**Length of compliance period requested:** Elite Spice respectfully requests an extension of 24 months beyond the original compliance deadline of April 5, 2026.

**Justification as to why the technology to implement the standard is not available:** The NESHAP proposes several actions that are either infeasible to implement or require a complete restructuring of current spice manufacturers’ operations. Regardless, the 18-month timeframe the

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