American Chemistry Council (ACC) and the American Fuel & Petrochemicals Manufacturers (AFPM).

We believe that the Administration has already been provided with sufficient information (including prior comments and the underlying petition for reconsideration on the HON rule) to support an exemption covering all regulated facilities or on a facility-specific basis. This letter provides additional detail and support on the time-critical nature of the request for relief and to address EPA's request for information. We submit both in support of a category-wide grant, as well as to provide company-specific information if the President pursues a facility-specific exemption action.

1. **The lack of existing and effective technology make the technology unavailable within the regulatory timeframe.**

The poor quality of certain existing equipment make technology required by the HON Rule effectively unavailable to Celanese facilities. The HON Rule requires that Celanese's Narrows (Virginia), Clear Lake (Texas), Bishop (Texas), and Bay City (Texas) facilities install technology to comply with the HON Rule. Celanese's experience with certain equipment and systems, however, demonstrates that certain technology required by the HON Rule is currently ineffective. At our Clear Lake facility, for example, Celanese installed a fenceline monitoring system to monitor a HON regulated chemical in 2021. The system proved *unable to effectively monitor* the pollutant, resulting in the facility having to discontinue the monitoring program.

Celanese continues to have significant concerns about continuing to commit significant capital expenditures while the HON Rule is reconsidered by EPA. The HON Rule requires significant costs to plan, procure, and install certain unproven technology within unrealistic compliance deadlines. Moreover, Celanese expects to compete with other companies to hire a limited number of consultants to install technology, driving up infrastructure costs, extending project deadlines, and increasing the risk that facilities must implement *operation shutdowns* to install effective technology past the HON Rule's compliance dates.

2. **Facilities may be required to shutdown operations to ensure compliance with the HON Rule, thereby reducing production of key products that support the security, economy, and public health and safety of the United States.**

Presidential Policy Directive 21: Critical Infrastructure Security and Resilience (PPD-21) advances a national policy to strengthen and maintain secure, functioning, and resilient critical infrastructure. PPD-21 recognizes the chemical sector as a critical infrastructure sector whose assets, systems, and networks, whether physical or virtual, are considered so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, national public health or safety, or any combination thereof. Implementation of the HON Rule, however, risks millions of dollars in ineffective and costly technology requirements and operation shutdowns for a United States company that continues to play a central role in protecting the security, economy, and public health and safety of the United States. Celanese is a more than *100 year-old U.S. headquartered (Irving, TX) global leader* in