



ELECTRONICALLY SUBMITTED

March 31, 2025

airaction@epa.gov

U.S. Environmental Protection Agency

1200 Pennsylvania Ave. NW

Washington, DC 20460

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: Sasol Chemicals (USA) LLC – Lake Charles Chemical Complex Westlake, Louisiana

To Whom It May Concern,

Sasol Chemicals (USA) LLC(Sasol) requests an exemption from the compliance obligations of 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 For the reasons highlighted in this letter, 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 our 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

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).

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) associations detailing the critical nature of ethylene oxide (EO) 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.

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.

Sasol’s Lake Charles Chemical Complex (LCCC) located in Westlake, Louisiana is directly impacted by the concerns presented by the ACC/AFPM in the letter “Petition for Reconsideration In Re: New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry (89 Fed. Reg. 42932). Docket ID: EPA-HQ-OAR-2022-0730,” submitted January 31, 2025. More specifically, Sasol wishes to reiterate the concerns referenced in the following sections of the January 31, 2025 petition below.

Fenceline Monitoring Provisions [§63.184]:

- V.2. Ethylene Oxide Action Level [§63.184(d)(3)];
- V.3. Summa Canister Sampling Logistics [§63.184(b)];
- V. 4. Additional Time Beyond 45 Days is Needed to Perform Effective Root Cause/Corrective Action Analysis and Implement Changes [§63.184(e)];
- V. 7. Reduced Sampling Frequencies Should be Available for Ethylene Oxide and Vinyl Chloride [§63.184(b)];
- V. 9. Revise §63.184(e)(1)(ii)(B) to Allow, Under Certain Conditions, the Use of Real-Time Sampling Techniques “As Soon as Practical”;

Equipment Leak Provisions [40 CFR 63 Subpart H]

- VI. Delay of Repair Should be Restored [§63.171(f)];
- VII. Classification of Releases from Pressure Relief Devices as Violations Should be Removed [§63.165(e)(3)(v)]; and
- VIII. Monthly Monitoring for Equipment in Ethylene Oxide Service Should be Revised [§63.168 and §63.174].

In 2018, ACC estimated the value of EO produced in the U.S. was \$3.5 billion and the value of downstream products from EO was \$5.4 billion. Additionally, EO production directly generated

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

more than 5,300 U.S. jobs and \$475 million in payroll.³

For Sasol's part, the EO Unit at LCCC reached beneficial operation in 2019 as part of the \$13 billion Lake Charles Chemicals Project. This expansion project positioned Sasol as one of the largest employers in Southwest Louisiana and one of the largest taxpayers. The EO that Sasol produces plays an important role in the production of specialty alcohols and surfactants. It also allows for LCCC to be fully integrated from ethane to ethylene to alcohols to surfactants.

As mentioned earlier, implementing the technologies required under the HON rule is proving extremely difficult within the timeframe currently imposed by the rule. One such example is fenceline monitoring. This monitoring via specialty-coated carbon canisters is set to begin nearly one (1) year from now. However, to our knowledge, there are very few laboratories both nationally and locally that are setup to process the canister samples under the newly promulgated EPA Method 327. Based on our work toward implementing fenceline monitoring, it seems highly unlikely that the infrastructure for this sampling will be set up given the limited availability of M327 accredited laboratories. Additionally, acquiring these specialty canisters in the quantities needed for a site of our size will be challenging, if next to impossible.

Sasol respectfully requests that the President grant a 2-year exemption from the final rule's upcoming compliance deadlines for LCCC. The impacted chemical manufacturing process units (CMPU) for LCCC include the following:

- Linear Alkyl Benzene (LAB) Unit; and
- Ethylene Oxide/Ethylene Glycol (EOEG) Unit.

Affected control devices and other associated sources with each CMPU are additionally located in the Ethylene Unit, the Ethoxylation (ETO) Units, and the Steam (STM) Unit.

Sasol is requesting a 2-year exemption for all applicable proposed amendments in the recent HON Rule for the CMPU referenced above. As discussed previously, there are practical challenges with the timeframes necessary to plan, procure, and install required technologies and such activity cannot occur within the current compliance timeframe. Further, a granted extension would enhance economic security, which is synonymous with national security (as discussed above).

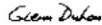
As you will note in the joint coalition of ACC and AFPM Presidential Exemption Request also submitted concurrently with individual company requests, the final rule is complex and presents myriad challenges for compliance. The coalition letter provides that while some individual company submittals **may** suggest that compliance could occur within two years based on unique facility circumstances, CAA 112(i)(4) does not require that the President provide the bare minimum

³ The Economic Benefits of Ethylene Oxide, <https://www.americanchemistry.com/content/download/13643/file/Cost-of-Deselecting-Ethylene-Oxide.pdf>

amount of time needed to obtain and install controls. In agreement with the coalition, we also strongly encourage any exemption granted under this section to be a length of 2 years with an option for EPA to consider a renewal should compliance processes may run longer than 2 years. If you have questions or need more information, please do not hesitate to contact Mr. Rusty J. Jack at rusty.jack@us.sasol.com.

Sincerely,

Signed by: Glenn Duhon
Signed at: 2025-03-31 23:40:13 +02:00
Reason: I approve



Glenn Duhon II
Senior Manager, Safety, Health & Environmental U.S.
Sasol Chemicals (USA) LLC

cc:

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Presidential Exemption Request – Sasol Chemicals (USA) LLC

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