



March 31, 2025

VIA ELECTRONIC MAIL
(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 for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry* (HON Rule)

To Whom It May Concern,

Ascend Performance Materials Operations LLC ("Ascend") respectfully 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 for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins Industry* Final Rule, which was promulgated by on May 16, 2024 (collectively referred to as the "HON Rule").¹ Ascend is requesting an additional two-year period to comply, subject to additional extension by the President. For the reasons highlighted in this letter, Ascend believes it is necessary and appropriate for the President to grant an exemption under Section 112(i)(4) of the Clean Air Act ("CAA"), 42 U.S.C. § 7412(i)(4), for sources regulated by the Final Rule either on an individual basis or on a category-wide basis.

If granted category-wide, Ascend requests that EPA include its regulated facilities under that collective action. Specifically, Ascend requests exemptions for its three

¹ 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 (May 16, 2024), codified at 40 C.F.R. Parts 60 & 63.