

using the same data set that EPA misapplied in the HON, the Agency proposed to raise the 2012 PVC D/F limits, well above what the incorrect HON limits contemplate.¹⁸ Thus, a grant of a Presidential exemption to our members is not expected to adversely affect the environment.

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The Vinyl Institute and its members appreciate this opportunity to request President Trump's consideration of a two-year exemption from compliance with the HON Rule pending the rule's reconsideration. Such an extension not only is appropriate and warranted under the criteria set out in Section 112(i)(4) of the Act, but it is consistent and furthers the President's economic and national security agenda. Please do not hesitate to contact Domenic DeCaria, Vice President - Regulatory & Technical Affairs of the Vinyl Institute, at ddecaria@vinylinfo.org or (202) 765-2179.

Respectfully submitted,



Ned Monroe
President and CEO
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Enclosure

cc: Aaron Szabo, Senior Advisor to the Administrator, Office of the Administrator
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¹⁸ See 85 Fed. Reg. 71,490, 71,494, 71,495 (Nov. 9, 2020).