

March 31, 2025

VIA E-MAIL

U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
airaction@epa.gov

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]: Indorama Ventures Oxides, LLC

To Whom It May Concern,

Indorama Ventures Oxides, LLC ("Indorama") 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 (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) (the "Presidential Exemption") 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. If done individually, we request an extension for the emission standards and limitations listed below for Indorama's facility in Port Neches, Texas ("Port Neches Facility").

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 which cannot occur within the current compliance timeframe, as recognized by precedent;² 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 regarding domestic priorities, "economic security is national security."³ As additional support on this point, we reference the joint coalition submission sent to EPA from associations the American Chemistry Council ("ACC") and the

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).

² See 90 Fed. Reg. 6773, 6774 (Jan. 17, 2025) (requesting information for a Presidential Exemption that would show that technology was "unavailable in time for installation and operation").

³ <https://www.whitehouse.gov/presidential-actions/2025/02/america-first-investment-policy/>.