



March 28, 2025

U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

**RE: Presidential Exemption: [National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI):
Shell Chemical LP, Geismar Plant, Geismar, Louisiana**

To Whom It May Concern,

Shell Chemical LP, Geismar Plant (Shell Geismar) requests an extension (approved via exemption) for the compliance obligations of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI HON) (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 extension (approved via 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 facilities under that collective action.

We support the comments submitted separately by the American Chemistry Council (ACC) and the American Fuel & Petrochemical Manufacturers (AFPM) and are offering additional information in support of our request for 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 facilities under that collective action.

Per EPA's guidance, the following information is provided:

- I. *Shell Chemical LP, Geismar Plant
7594 Hwy 75
Geismar, Louisiana 70734*
- II. *Shell LP, Geismar Plant is a major source of hazardous air pollutants and subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI HON), including new provisions contained in the July 2024 final rule for ethylene oxide / ethylene glycol manufacturing. Broadly, with regard to applicability of SOCMI HON at Shell Geismar, there are two process units (EOEG-2 and EOEG-3), along with ancillary infrastructure such as flare systems, product storage, product transfer and loading, and wastewater management/treatment systems.*

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).

- III. *Due to the significant amount of planning time and capital expenditure currently ongoing at Shell Geismar to assess, define, select technologies, select vendors, procure long lead item equipment, execute construction, and commission new equipment and practices to meet SOCMI HON requirements, Shell LP requests a two-year extension. Since EPA has publicly stated an intent to reconsider the provisions of SOCMI HON, should such reconsideration result in changes to the regulatory requirements, an additional extension may be required.*

Shell Chemical LP appreciates consideration of this request. Should any additional information be needed in support of this request, please contact me at kevin.poché@shell.com

Sincerely,



Kevin J. Poche
Environmental Manager
Shell Chemical LP, Geismar Plant

cc: Aaron Szabo, Senior Advisor to the Administrator, Office of the Administrator
Abigale Tardif, Principal Deputy Assistant Administrator, Office of Air and Radiation
Sean Donahue, Principal Deputy General Counsel, Office of General Counsel
Alex Dominguez, Deputy Assistant Administrator for Mobile Sources, Office of Air and Radiation
Peter Tsirigotis, Director, Office of Air Quality Planning and Standards
Penny Lassiter, Director, Sector Policies and Programs Division, Office of Air Quality Planning and Standards
Patrick Lessard, Refining and Chemicals Group Leader, Office of Air Quality Planning and Standards
Andrew Bouchard, General Engineer, Office of Air Quality Planning and Standards