

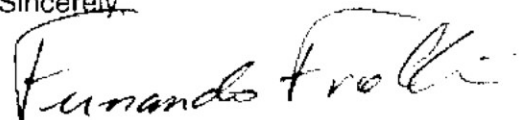
that can also increase crop yields), antifreeze, plastics, home and personal care products, and textiles. It also performs a crucial role as a sterilizing agent for heat-sensitive medical equipment that cannot be sterilized with steam or radiation. UCC/Dow estimates that its U.S. manufactured ethylene oxide supplies the requirements of 75% of the U.S. government's jet fuel additive, 25% of the automotive brake fluid market, and nearly 10% of aircraft deicing fluids—all essential products required for national safety and the smooth functioning of the U.S. economy.

Absent a compliance exemption, it is likely UCC/Dow will have to shut down some facilities that produce or use ethylene oxide in the second half of 2026 to comply with the HON rule, which will have downstream impacts on these derivatives of ethylene oxide with consequences for all of the sectors mentioned above. If UCC/Dow were to shut down multiple facilities simultaneously, the cascading impacts of the loss of ethylene oxide production would be widespread and felt throughout the U.S., both economically and from an essential products perspective. During these outages, employees may also face loss of work, negatively impacting the local community and individual American families' households.

As explained further in Attachment #1, UCC/Dow originally requested a one-year compliance extension to July 15, 2027, to complete construction on these projects and an additional 150 days to December 12, 2027, to complete all required performance testing and establishment of operating parameters and to submit the Notification of Compliance Status Report. The Presidential Exemption under Clean Air Act Section 112(i)(4) does not require that the President provide the bare minimum of time needed to obtain and install controls. Thus, to allow for any unexpected delays in the project schedules, with this letter we are seeking a two-year compliance exemption under Section 112(i)(4) of the Clean Air Act to July 15, 2028 to complete the site's HON implementation projects and a compliance exemption to December 12, 2028, to submit the Notification of Compliance Status Report for those projects. Any exemption granted under this section should also contain an option for EPA to consider a renewal for facilities for which compliance processes may run longer than two years.

If you have any questions or require additional information, please contact Mr. Russell Wozniak of our Environmental Expertise organization at (361) 571-5420 or email: wozniara@dow.com.

Sincerely,



Fernando Frollini
Responsible Care Leader
Seadrift Operations

Attachments: