

the labs to prepare for all the increased samplings and testings. All of this is technically infeasible by the current compliance deadline of July 15, 2026.

When real-time monitoring is required, the facility will still have to bid out to contractors to perform these methods. Many other facilities that are required to do fenceline monitoring will be using the same available contractors and, as such, they may not be available within the required 30 day time period.

The Administration has already received previous comments addressing other specific concerns surrounding the Method 327 and the availability of the fenceline monitoring technology by the compliance deadline. Please refer to the joint submission sent to EPA from associations the American Chemistry Council (ACC) and the American Fuel & Petrochemicals Manufacturers (AFPM) dated July 7, 2023.

- "An explanation why an extension is in the national security interests of the United States"

National security is not limited to military defenses and infrastructure but also includes economic security, as acknowledged by the President in Executive Orders and key security agencies like the Department of Defense. The White House has stated in its' "America First Investment Policy", dated February 21, 2025, "economic security is national security."¹

LCLA uses EO as an intermediate within our process to create our products. The stringent requirements surrounding EO within this new HON ruling will make it difficult to meet customer demands for all regulated facilities if, for example, the unit must shutdown to repair EO components. This could lead to some supply chain disruption across the nation. See the joint ACC and AFPM submission for more comments on this matter.

LCLA believes the Administration has been provided with sufficient information to support an exemption and is submitting this letter in timely fashion and provides the requested information. LCLA submits this letter in support of a category-wide exemption or facility-specific exemption action.

For the reasons presented above, LCLA is requesting at least a one-year extension to the July 15, 2026 compliance deadline surrounding fenceline monitoring and EO specific requirements, in order to afford reasonable time and resources to implement the programs.

Thank you in advance for this consideration,



Steve Parker
Site Director

Cc: EPA Region 6, Dallas, TX

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

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