

We believe that the Administration has already been provided with sufficient information (including prior comments and the underlying petition for reconsideration on the HON rule) to support an exemption covering all regulated facilities or on a facility-specific basis. This letter and the attachments provide additional detail and support on the time-critical nature of the request for relief and to address EPA's request for information. We submit both in support of a category-wide grant, as well as to provide company-specific information if the President pursues a facility-specific exemption action.

A two-year compliance exemption is especially needed for the following HON implementation projects at our Seadrift, Texas site.

Seadrift, TX Site

- Installation of two new vent scrubber projects to control any process vents that may contain low concentrations and low emissions of ethylene oxide, but that are "In Ethylene Oxide Service" from the Glycol Ethers Plant and the Ethanolamines Plant. The water from these scrubbers will be further processed in a process wastewater reactor system, called a Purge Glycol Reactor, to react any residual ethylene oxide to other organic compounds.
- Process wastewater streams from the Glycol Ethers Plant and the Ethanolamines Plant will also flow to the same Purge Glycol Reactors that will be installed by the vent scrubber project. The Purge Glycol Reactors will react small concentrations of ethylene oxide to other chemical compounds.

The following information associated with this request for our Seadrift, Texas site is included in a February 26, 2025, letter to EPA, which is included as Attachment #1 to this letter.

- Emissions standards or limitations subject to the request,
- Facility(ies) and/or affected source(s), and
- Length of compliance period being requested. The original Attachment #1 requested a one-year compliance date extension, which was the maximum allowed, but Dow is seeking a two-year compliance exemption with this letter to account for any potential delays in the projects.

Information in support of the compliance exemption requests for this site is provided below:

Explanation why the technology to implement the standard is not available.

Vent Scrubber Projects – Seadrift, Texas:

Technology to implement the standard is not available prior to July 15, 2026, for the following reasons:

- Both scrubber projects will involve water scrubbers to remove low levels of ethylene oxide from process vents in the Glycol Ethers Plant and the Ethanolamines Plant. For water scrubbers, the HON rule requires the owner or operator using a control device other than a flare, scrubber with a reactant tank, or thermal oxidizer, to notify the