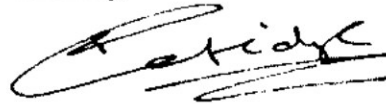


required by the military, including parachutes, rope, lifting slings and straps, personal tactical gear, and body armor. The military's use of Nylon 6,6 is extensive and spans various applications, ensuring reliable and durable performance in demanding operational environments. The strength, flexibility, and reliability of this material make it a preferred choice for military-grade equipment and gear. In addition to Nylon 6,6, Ascend manufactures other materials that are critical to carbon fiber composite requirements of the U.S. military, and therefore is deemed an essential business by the U.S. government.

Ascend's products are also vital across a wide range of civilian markets. Engine cooling tanks, radiator fan blades, EV battery housings, brackets, and airbag fiber are among the many parts U.S. and global automakers create using Nylon 6,6. Electrical and electronic makers use Nylon 6,6 for flame-retardant connectors and critical parts in millions of appliances and household items annually. Ascend's specialty chemicals and materials are used in disposable battery seals, paints, coatings, detergents, asphalt additives, and a wide range of other applications critical to everyday life. Nylon 6,6 has been utilized in thousands of military and civilian applications over the last 70 years, making it crucial to the economic and security interests of the United States.

For the reasons set forth above, Ascend respectfully requests an exemption from the compliance requirements of the HON Rule at its three chemical manufacturing facilities for a period of two years, subject to further extension by the President, pursuant to CAA § 112(i)(4).

Sincerely,



Paul Cartlidge
Senior Vice President
Environment Health Safety & Sustainability

cc: Aaron Szabo, Senior Advisor to the Administrator, Office of the Administrator
(szabo.aaron@epa.gov)
Abigale Tardif, Principal Deputy Assistant Administrator, Office of Air and
Radiation (tardif.abigale@epa.gov)
Sean Donahue, Principal Deputy General Counsel, Office of General Counsel
(donahue.sean@epa.gov)
Alex Dominguez, Deputy Assistant Administrator for Mobile Sources, Office of Air
and Radiation (dominguez.alexander@epa.gov)
Peter Tsigotis, Director, Office of Air Quality Planning and Standards
(tsigotis.peter@epa.gov)