

National Security Interests: The recycling industry, including JSS and Recovermat, is vital for national security. These facilities provide essential raw materials for various industries, including defense, infrastructure, and manufacturing, thereby reducing reliance on imports and enhancing economic security.

Economic and Environmental Benefits: Smith Industries supports thousands of jobs and contributes significantly to the economy. In 2021, the company recovered over 1.6 billion pounds of metals, eliminating the need for 3.4 million tons of ores and saving energy equivalent to the annual usage of approximately 471,000 U.S. households. This also prevented nearly 1.9 million tons of carbon dioxide emissions.

Alignment with EPA Initiatives: Granting the exemption aligns with the EPA's "Powering the Great American Comeback" initiative, supporting clean air, energy independence, permitting reform, American innovation, and the protection of American auto jobs.

Requested Compliance Period: Smith Industries is requesting a compliance period extension of four years to develop and implement feasible VOC control technologies.

We appreciate your consideration of this request to allow JSS and Recovermat to continue their essential operations while working towards compliance with VOC reduction standards.

Attachment

Sincerely,

Dale.



Dale G. Mullen | Partner

Two James Center

1021 East Cary Street

Suite 2001

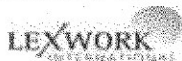
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Message

From: AirAction [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA78B98923384078995E04A73D258D83-AIRACTION]
Sent: 4/1/2025 2:02:49 PM
To: Allen, Bryan Michael [bryan.allen@faegredrinker.com]
Subject: RE: Presidential Exemption: NESHAP: Ethylene Oxide Emissions Standards for Sterilization Facilities: Trinity Sterile, Inc.

Thank you for emailing the AirAction mailbox to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act and for engaging with EPA in advancing President Trump's Executive Orders and Powering the Great American Comeback. We have received your email and will be in contact soon. If you have Confidential Business Information (CBI) that you'd like to submit, please submit it in electronic version to the CBI@epa.gov inbox or in hardcopy to:

USEPA, OAQPS
CORE CBI Office
4930 Old Page Road
Durham, NC 27703

From: Allen, Bryan Michael <bryan.allen@faegredrinker.com>
Sent: Monday, March 31, 2025 4:52 PM
To: AirAction <AirAction@epa.gov>
Subject: Presidential Exemption: NESHAP: Ethylene Oxide Emissions Standards for Sterilization Facilities: Trinity Sterile, Inc.

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear EPA,

Please find attached a formal request on behalf of Trinity Sterile, Inc. for a two-year exemption from the Ethylene Oxide Emissions Standards for Sterilization Facilities, as outlined in Section 112(i)(4) of the Clean Air Act.

Facility Information:

- Facility Name: Trinity Sterile, Inc.
- Facility Address: 201 Kiley Drive, Salisbury, MD 21801

Emissions Standards or Limitations Subject to the Request:

- "National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review", 40 CFR Part 63, Subpart O (89 FR 24090; April 5, 2024) (Sterilizer Rule)

Length of Compliance Period Being Requested:

- 2-year exemption from April 6, 2026, to April 6, 2028.

The attached request includes justifications based on the unavailability of required technology and the national security interests of the United States, and an appropriate delegation of authority from Trinity to submit this request on their behalf. The attached letter does not include any proprietary information. However, such information may be available if deemed necessary by the EPA, which can be submitted in accordance with applicable rules and regulations to protect confidential business information.

Please do not hesitate to contact us if you require any additional information or steps to process this request.

Kind regards,