

chemical manufacturing facilities located in 1) Decatur, Alabama ("Ascend Decatur"); 2) Alvin, Texas ("Ascend Alvin"); and 3) Cantonment, Florida ("Ascend Pensacola").

We urge the Administration to consider and issue such an action based on an understanding that both: 1) "availability" for the purposes of CAA § 112(i)(4) refers not only to the existence of technology capable of achieving compliance with the rule, but encompasses practical challenges with the timeframes necessary to plan, procure, and install required technologies and such activity cannot occur within the current compliance timeframe; and 2) national security encompasses not only military defense applications and infrastructure, but also economic security, a perspective that has been acknowledged by the President in executive orders and by key security agencies like the Department of Defense. Indeed, as the White House has stated regarding domestic priorities, "economic security is national security."²

As additional support on this point, we reference the separate joint coalition submission sent to EPA from associations the American Chemistry Council ("ACC") and the American Fuel & Petrochemicals Manufacturers ("AFPM") detailing the critical nature of the chemicals subject to the HON rule as building blocks to several supply chains throughout domestic manufacturing, and the potential risks to our nation's national security interests if continued production is jeopardized.

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 provides 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.

I. Individual Facility Information

Given the complex interweaving of requirements in the HON Rule, Ascend believes it is appropriate to extend compliance deadlines for the requirements of the HON Rule collectively. However, to the extent EPA seeks to identify individual emission standards or limitations within the HON Rule for exemption, compliance deadlines for the following requirements at the following three Ascend facilities, along with their associated monitoring, reporting, and recordkeeping requirements, should be extended for a period of two years, subject to additional extension by the President:

Facility Name & Address	Operating Permit & Issuing Agency	Regulatory Requirements
1. Ascend Decatur: 1050 Chemstrand Ave	Title V Permit No. 712-0010	Heat Exchanger Systems & Cooling Towers: 40 C.F.R. § 63.104(g)

² America First Investment Policy, *available at* <https://www.whitehouse.gov/presidential-actions/2025/02/america-first-investment-policy/>.