

chemistry and specialty material solutions. Our products are used in various industries that Americans rely on every day including medical applications, automotive, building and construction, and electronics. We have operations around the globe, including in 13 U.S. States and Territories and more than 20 countries globally. We employ over 11,000 people globally, with over 3,500 in the U.S. We support approximately 2,000 employees and contractors at our Narrows, Clear Lake, Bishop, and Bay City facilities located in Virginia and Texas.

The Narrows, Clear Lake, Bishop, and Bay City facilities, in particular, produce key products for the U.S. and world economies. Our Bishop facility is one of the only U.S. producers of formaldehyde, which is used in medical applications to produce lifesaving medical devices such as metered dose inhalers, injectable pens, and insulin delivery devices. Our Narrows facility is one of two facilities in the U.S. that produces cellulose acetate flake, which is a material used to produce a wide range of products like plastics, films, and fibers. Clear Lake and Bay City produce key products like acetic acid and vinyl acetate, which are used to produce products like paints, adhesives, energy products, and laminated glass for American-made cars and buildings. Requiring Celanese to install ineffective and costly technology and risk operation shutdowns as a result of the HON Rule would negatively impact the security, economy, and public health and safety of the U.S.

Conclusion

Granting a two-year presidential exemption ensures that Celanese continues to support the U.S. economic and national security without procuring and installing ineffective and costly technology within the rule's existing timeline and without implementing full or partial shutdowns to comply with existing effective dates and compliance obligations. We appreciate EPA's willingness to hold follow-up discussions with ACC and AFPM members to better understand the impacts of the HON Rule on American businesses.

Sincerely,



Darren Hubbard
Senior Director, Environmental and Sustainability

cc: Aaron Szabo, Senior Advisor to the Administrator, Office of the Administrator
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