

Message

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From: [REDACTED]@epa.gov]  
Sent: 3/21/2025 1:39:33 PM  
To: [REDACTED].gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED].Jan@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]

CAA s. 112(i)(4)

**(4) Presidential exemption**

The President may exempt any stationary source from compliance with any standard or limitation under this section for a period of not more than 2 years if the President determines that the technology to implement such standard is not available and that it is in the national security interests of the United States to do so. An exemption under this paragraph may be extended for 1 or more additional periods, each period not to exceed 2 years. The President shall report to Congress with respect to each exemption (or extension thereof) made under this paragraph.

Message

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From: [REDACTED]@epa.gov]

Sent: 3/21/2025 7:26:59 PM

To: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]

## Ex. 5 Deliberative Process (DP)

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Message

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**From:** [REDACTED]@epa.gov]

**Sent:** 3/21/2025 7:29:35 PM

**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]



2025.03.21\_Presidential Exemption Directions\_ Edits.docx

2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Message

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**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75B1EEC7B16E46D589114935FC6A771E-[REDACTED]  
**Sent:** 3/21/2025 2:50:37 PM  
**To:** AirAction [AirAction@epa.gov]  
**Subject:** test

[REDACTED]

Message

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**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75B1EEC7B16E46D589114935FC6A771E [REDACTED]]  
**Sent:** 3/21/2025 4:09:37 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Directions for Presidential Exemption Submissions

I added a bit from [REDACTED]'s email - sending on now.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:52 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: Directions for Presidential Exemption Submissions

This looks good to me [REDACTED]

Would you share with [REDACTED] and [REDACTED] and ask what the next steps are?

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:09 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Directions for Presidential Exemption Submissions

Here's a link for your review! I was envisioning language for use in an email and on a webpage. If anyone has any more specifics about what should be submitted, that would be awesome 🙌

Including all but [REDACTED] on this draft.

[Presidential Exemption Directions .docx](#)

Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75B1EEC7B16E46D589114935FC6A771E-[REDACTED]]  
**Sent:** 3/21/2025 4:29:11 PM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Subject:** RE: Directions for Presidential Exemption Submissions

Thanks [REDACTED] I added a bit of this.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:53 AM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Subject:** RE: Directions for Presidential Exemption Submissions

## Ex. 5 Deliberative Process (DP)

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:09 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Subject:** Directions for Presidential Exemption S [REDACTED]

Heres a link for your review! I was envisioning language for use in an email and on a webpage. If anyone has any more specifics about what should be submitted, that would be awesome 😊

Including all but [REDACTED] on this draft.

[Presidential Exemption Directions .docx](#)

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/21/2025 3:53:21 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Directions for Presidential Exemption Submissions  
**Attachments:** Sterilizers 112(i)(4) memo.pdf

## Ex. 5 Deliberative Process (DP)

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:09 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Directions for Presidential Exemption Submissions

Heres a link for your review! I was envisioning language for use in an email and on a webpage. If anyone has any more specifics about what should be submitted, that would be awesome 😊

Including all but [REDACTED] on this draft.

 [Presidential Exemption Directions .docx](#)

## Presidential Documents

Memorandum of January 16, 2025

### Orderly Implementation of the Air Toxics Standards for Ethylene Oxide Commercial Sterilizers

Memorandum for the Administrator of the Environmental Protection Agency and the Secretary of Health and Human Services

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered as follows:

**Section 1. Policy.** The strengthened and updated Clean Air Act standards for ethylene oxide (EtO) emitted into the air from commercial sterilizing facilities issued by the Environmental Protection Agency (EPA) on April 5, 2024, *National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review, Final Rule*, 89 FR 24,090 (Apr. 5, 2024) ("EtO Rule"), achieved a new milestone in my Administration's efforts to protect public health for all Americans and to advance the objective of my Administration's Cancer Moonshot initiative to prevent cancer before it starts. EtO has been associated with elevated cancer risks in communities around the United States and can be particularly harmful to children. The loss of loved ones from environmentally related cancer is a tragedy that the Nation can and must work together to end, once and for all.

The EtO Rule was issued after careful consideration of public comments and public hearings. In this rule, EPA set standards under section 112 of the Clean Air Act, as amended (the "Act") (42 U.S.C. 7401 *et seq.*), to control emissions from commercial sterilizers through the use of demonstrated and achievable pollution control technologies and practices. These standards will significantly reduce emissions of the toxic air pollutant EtO.

The EtO Rule applies to facilities that sterilize medical products, including medical devices and pharmaceuticals. Sterilization is critical to maintaining a safe supply of medical devices for patients and hospitals and providing health care to millions of Americans to help them stay healthy and fight diseases, including cancer. Consequently, EPA worked closely with the Department of Health and Human Services, including the Food and Drug Administration, to develop a final rule that protects communities exposed to pollution from sterilization facilities while also mitigating and managing the potential risk of any medical device supply disruptions.

EPA concluded that sterilization facilities will be able to install the appropriate technology to meet the standards of the EtO Rule before the compliance deadlines mandated by the Act. The EtO Rule also recognized that the President's authority under section 112(i)(4) of the Clean Air Act, 42 U.S.C. 7412(i)(4), to exempt individual facilities from compliance for a set period of time may provide an important mechanism to address the possibility that a facility may be unable to install all appropriate technology before the compliance deadline. 89 FR at 24,103. It is of vital national importance to ensure the reduction of EtO emissions to the level that EPA determined is required to protect public health pursuant to the Clean Air Act, while also avoiding the national security and public health effects that could result from a significant disruption to the medical device supply chain.

It is the policy of my Administration to safeguard the reliability of our Nation's supply of safe medical products. To advance orderly implementation of the EtO Rule, I am therefore establishing a process, provided below,

for considering requests for Presidential exemptions, the duration of which shall be as short as possible and no longer than two years. This process will ensure consideration of such requests in the exceptional circumstances in which a commercial sterilizer can demonstrate that, notwithstanding due diligence and best efforts, it will be unable to meet a covered standard or limitation required by the EtO Rule before the compliance deadline due to the unavailability of control technology for the facility, leading to likely shutdown of the facility, and the best available information demonstrates that the shutdown of the facility will likely lead to a serious disruption to the supply of medical products, such as medical devices and pharmaceuticals, necessary for America's national security and public health.

To achieve the EtO Rule's critical health protections as soon as practicable, while safeguarding the supply of safe medical products from disruption that would compromise the health and welfare of the American people, I direct you to take the following actions:

**Sec. 2. Implementation of a Process for Considering Presidential Exemptions.** The Administrator of the EPA (Administrator) shall receive requests for a Presidential exemption from a standard or limitation in the EtO Rule under section 112(i)(4) of the Act (42 U.S.C. 7412(i)(4)), review them, and advise the President regarding whether to grant them through the following process:

(a) Any commercial sterilizer seeking such an exemption shall submit a request to the Administrator no earlier than 12 months and no later than 4 months before the compliance deadline for which an exemption is sought. The request shall include:

(i) specific information of sufficient detail to enable verification of the reason or reasons that the technology to implement the applicable standard or limitation is unavailable for installation and that, notwithstanding its due diligence and best efforts, the facility cannot be brought into compliance before the compliance deadline for the covered standard or limitation (e.g., contracts, documentation of communication with vendors or suppliers);

(ii) a plan for procuring, installing, and operating the technology as soon as feasible in order to achieve compliance with the EtO Rule, and an assurance as described in subsection (b)(ii) of this section;

(iii) a list of all available practicable measures (i.e., technological and operational) that have already been taken or that are planned to advance compliance and additional measures, if any, that will be implemented to reduce the emissions of EtO and resulting risks during the exemption period;

(iv) a list of any alternative steps available, in progress, or already taken to try to avoid the need for additional time for compliance;

(v) the type or types of products sterilized at the facility, the volume of products sterilized at the facility, and the facility's annual sterilization capacity; and

(vi) the name, title, and signature of the responsible official who is certifying the accuracy of the request.

(b) In reviewing an exemption request, and the information provided pursuant to this section, the Administrator, in consultation with the Secretary of Health and Human Services (Secretary), shall consider:

(i) whether the technology to implement a covered standard or limitation will be unavailable in time for installation and operation of the technology at a specific facility before the compliance deadline for such standard or limitation, due, for example, to shortages of labor, parts, control technology supply, supply-chain disruption, or other factors out of the facility's control;

(ii) the amount of time needed for installation and operation to occur in order to achieve compliance with the EtO Rule;



(iii) the risk of a serious disruption to the supply of medical products (including pharmaceuticals and medical devices) should the facility be required to temporarily pause sterilization activities or reduce capacity until installation and operation can occur (including any potential alternatives to assure a sufficient supply of sterilization and sterilized medical products);

(iv) the potential effect of any such disruption on public health and welfare, and any other information that may be relevant to an evaluation of whether granting an exemption is in the national security interests of the United States; and

(vi) any other information that the Administrator, in consultation with the Secretary, deems relevant.

(c) No later than 30 days after receiving a request pursuant to subsection (a) of this section, the Administrator shall confirm receipt of the request, notify the requester of any additional information needed to evaluate the request, set a deadline of no later than 15 days for the requester to provide the requested information, and provide public notification that the request was submitted (including the name of, the location of, and any other information regarding the facility requesting the exemption that the Administrator, in consultation with the Secretary, deems relevant and appropriate to publish).

(d) As soon as practicable and no later than 30 days after receiving all necessary information to evaluate a request pursuant to this section, the Administrator, in consultation with the Secretary, shall provide the Chairman of the Council on Environmental Quality (CEQ) with the request and accompanying information from the requester, any additional information that the Administrator deems relevant, and a recommendation regarding whether an exemption is warranted, including the basis for the recommendation, and if recommending that the President grant an exemption: the recommended duration, and any other accompanying terms or conditions (such as a schedule for status reports regarding planned steps and progress to achieve compliance with the EtO Rule).

(e) As soon as practicable and generally within 45 days after receiving a recommendation from the Administrator pursuant to subsection (d) of this section, the Chairman of CEQ, in consultation with the Assistant to the President for National Security Affairs, the Assistant to the President for Economic Policy, the Assistant to the President for Domestic Policy, the Director of the Office of Pandemic Preparedness and Response Policy, and the Director of the Office of Science and Technology Policy, shall advise the President concerning the request for an exemption.

(f) As expeditiously as practicable after the grant or denial of any exemption by the President under this process, and no later than 10 days after such a grant or denial, the Administrator shall notify the applicant.

(g) Within 60 days of the grant of any exemption by the President under this process, the Administrator shall make publicly available online the name of, location of, and any other appropriate and relevant information regarding the facility receiving the exemption and the duration of any exemption, and shall submit to Congress the report required by section 112(i)(4) of the Act (42 U.S.C. 7412(i)(4)) on behalf of the President.

(h) The Administrator shall, as appropriate:

(i) provide technical assistance to any facility that receives an exemption to promote compliance with the EtO Rule;

(ii) seek information and assurance from any facility that requests an exemption that the facility will use its best efforts and will take reasonable and appropriate steps to demonstrate diligent action to install and operate necessary technology as expeditiously as practicable (including to fulfill any accompanying terms or conditions) to achieve compliance with the EtO Rule; and



(iii) inform the Chairman of CEQ when installation of such technology is complete.

**Sec. 3. Federal Coordination.** The Secretary, in consultation with the Administrator, shall consider taking additional steps, as appropriate, to further advance the goal of protecting the public from cancer and other harms from EtO exposure, including spurring innovation to reduce exposure to EtO and other carcinogenic air pollutants and to expand access to safe, effective, and reliable alternative methods for sterilization of medical equipment and pharmaceuticals that do not depend on EtO, and continuing to strengthen the resilience of our Nation's medical supply chain. Within 2 years of the date of this memorandum, the Secretary shall provide a report to the Chairman of CEQ regarding progress toward this directive and any steps taken or planned.

**Sec. 4. General Provisions.** (a) Nothing in this memorandum shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This memorandum shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This memorandum is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

(d) The Administrator is authorized and directed to publish this memorandum in the *Federal Register*.



THE WHITE HOUSE,  
Washington, January 16, 2025

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/21/2025 6:25:34 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Thanks [REDACTED]

[REDACTED] Since you will be out some next week, I can take this. I'll probably ask [REDACTED] for help too. Would you replace the text in your shared document with Aaron's text and resend the link?

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 2:15 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>  
**Subject:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Please see Aaron's edits attached. We need to share with OGC for their review/input. **Ex. 5 Deliberative Process (DP)**  
[REDACTED]e would also like to have this posted on Monday. Let me know if that's possible.

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/21/2025 6:37:54 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I do not know that answer but can ask when I follow up again this afternoon.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 2:33 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

## Ex. 5 Deliberative Process (DP)

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 2:15 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Please see Aaron's edits attached. We need to share with OGC for their review/input.

Ex. 5 Deliberative Process (DP)

[REDACTED] would also like to have this posted on Monday. Let me know if that's possible.

Message

**From:** [REDACTED]@epa.gov  
**Sent:** 3/21/2025 9:17:18 PM  
**To:** [REDACTED]@epa.gov  
**CC:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Subject:** RE: Presidential Exemption -- text and communication plan

Thanks [REDACTED], Aaron is comfortable with us posting on the OAQPS Stationary Source page

[REDACTED], I let Aaron know we are already working with you on comms plan and should have draft populated Monday morning

Ex. 5 Deliberative Process (DP) We can talk more about that on Monday.

I told OAR we would clean up the pager drafted on Monday after we incorporate some of OGC's edits and we will have comms plan as well. They want this posted on Monday and I'd like to target COB Monday if that's possible.

Thanks all that worked on this today. Have a great weekend and we will pick this back up on Monday.


Thanks,  
[REDACTED]

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 4:27 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Presidential Exemption -- text and communication plan

Hi [REDACTED] -

Here are some materials for a Monday afternoon announcement of the email box.

Communication strategy:  112 Presidential Exemptions -- announcing process -- Com Strategy.docx  
Web text/email: Attached as a static file

We recommend posting the announcement here. We're working on a new banner that will link to a new page.

<https://www.epa.gov/stationary-sources-air-pollution>

On Monday, we can also put a link on each of the nine NESHAP pages from the March 12<sup>th</sup> announcement.

Have a great weekend!

Thanks,

[REDACTED]

\*\*\*\*\*

[REDACTED]

Director

Policy Analysis and Communications

EPA's Office of Air Quality Planning and Standards

[REDACTED]

[REDACTED]

Call me on Teams

[REDACTED]

Message

**From:** Stanko, Joseph  
[jstanko@hunton.com]  
**Sent:** 3/24/2025 8:29:41 PM  
**To:** [REDACTED]  
[REDACTED]@epa.gov]  
**Subject:** RE: Peter asked me to  
get back to you re; your  
question on the  
presidential exemption

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

[REDACTED]  
Thanks, this is super-helpful.  
Regards,  
Joe

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 4:28 PM  
**To:** Stanko, Joseph <jstanko@hunton.com>  
**Subject:** Peter asked me to get back to you re; your question on the presidential exemption

**This Message Is From An External Sender**

Hunton Andrews Kurth warning: This message came from outside the firm.

We just posted this earlier this afternoon - [Clean Air Act Section 112 Presidential Exemption Information US EPA](#)

Feel free to call me [REDACTED] if you have questions.

- [REDACTED]

Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5AB7EF4A59614FD4B4485668C42818C7: [REDACTED]]  
**Sent:** 3/24/2025 8:26:07 PM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov;  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov;  
**Subject:** AirAction [AirAction@epa.gov]  
RE: 112 Presidential Exemption Info - so far

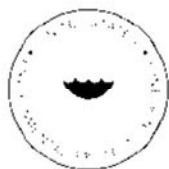
Thanks for the quick reply.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 4:21 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
**Subject:** RE: 112 Presidential Exemption Info - so far

We did. You can find the information here:

<https://www.epa.gov/stationary-sources-air-pollution>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>



U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED]

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 4:20 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>; AirAction <AirAction@epa.gov>  
**Subject:** RE: 112 Presidential Exemption Info - so far



**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:40 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>;  
 [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>;  
 [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>;  
 [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; AirAction <AirAction@epa.gov>  
**Subject:** 112 Presidential Exemption Info - so far

Thanks for starting to think about the process for collecting requests for a Presidential Exemption from nine NESHAPS (identified below) using CAA section 112(i)(4). As Marguerite knows, we have said publicly that we would accept these requests through 3/31/25.

- Today at 3pm, we are planning to post a website with more information about the process. In sum, people will be able to submit applications via [attaction@epa.gov](mailto:attaction@epa.gov). I am copying the SPPD communications team because they are likely to have a role in the downstream processing of these requests.

Attached are a static copies of the web text and the draft communication strategy. Both documents are being shared with OAR leadership this morning. Aaron has already weighed in, as has OGC.

Please let me know if you have questions or ideas or concerns.

ED 018865 00000065-00002



**From:** [REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 12:06 PM  
**To:** [REDACTED]@epa.gov>  
**Subject:** RE: Question from SPPD

For a future conversation, leading questions from [REDACTED]

"Main questions I have at this point are:

1. **Ex. 5 Deliberative Process (DP)**
- 2.
- 3.

My understanding is they have until 3/31 to ask to turn around period will be quite quick"

**From:** [REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 10:37 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Question from SPPD

Hi [REDACTED]

[REDACTED] just asked me who in PACS will be working on presidential exemptions for SPPD rules. Any insights on this?

Thanks,  
[REDACTED]

[REDACTED]  
Environmental Protection Specialist  
U.S. EPA, Office of Air Quality Planning and Standards  
Policy Analysis & Communications  
[REDACTED]

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5AB7EF4A59614FD4B4485668C42818C7-[REDACTED]  
**Sent:** 3/24/2025 8:28:01 PM  
**To:** jstanko@hunton.com  
**Subject:** Peter asked me to get back to you re; your question on the presidential exemption

We just posted this earlier this afternoon - [Clean Air Act Section 112 Presidential Exemption Information - US EPA](#)

Feel free to call me [REDACTED] if you have questions.

- [REDACTED]

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/18/2025 2:53:20 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov];  
[REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]

**Start:** 3/18/2025 4:00:00 PM  
**End:** 3/18/2025 5:00:00 PM  
**Show Time As:** Busy

Required Attendees: [Redacted]  
Optional Attendees: [Redacted]

Before the briefing with Abbie tomorrow, we need to cover a number of questions about possible scenarios and adjust the briefing plan and materials accordingly as best possible. Here are questions raised by [REDACTED] this morning:

- Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

### Ex. 6 Personal Privacy (PP)

Meeting ID: [Ex. 6 Personal Privacy (PP)]  
Passcode: [Ex. 6 Personal Privacy (PP)]

### Dial in by phone

[Ex. 6 Personal Privacy (PP)]

United States, Raleigh

Phone conference ID: [Ex. 6 Personal Privacy (PP)]

### Join on a video conferencing device

Tenant key: sip:teams@video.epa.gov

Video ID: [Ex. 6 Personal Privacy (PP)]

[More info](#)

For organizers: [Ex. 6 Personal Privacy (PP)]

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

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[ SEQ CHAPTER \h \r 1]OAR Meeting Request Form  
Abigale Tardif

**Date of this Request:** February 27, 2025

**Scheduling Point of Contact:** [REDACTED]

**Subject:** Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension.

**Purpose:** Provide summary of EPA's 2024 Commercial Sterilizers NESHAP RTR rulemaking, litigation status and petitions, and discuss the CAA section 112(i)(4) Presidential compliance extension process.

**First possible date for meeting:** March 5, 2025 (note: 2:00 to 2:45pm on 3/5/2025, if possible)

**Last possible date for meeting:** March 7, 2025

**Duration:** 45 minutes

**Reasons for Requested Dates/Duration:** We believe it would be beneficial to have this briefing before the OAR meeting with industry on 3/6/2025 titled "Clean Air Action Section 112."

**Requested Meeting Format** (select one):

Virtual

☒ Hybrid (in-person and virtual option; pending in-office availability of leadership team)

**Invitees** (please list invitees by Office and in the following format: *Last,First, (ex. Blossom.Cherry)*)

OAR

Tardif, Abigale; Dominguez, Alexander

OAQPS

[REDACTED]

OGC

[REDACTED]

\*Please submit this OAR internal meeting request form to [ [HYPERLINK "mailto:OAR\\_Scheduling@epa.gov"](mailto:OAR_Scheduling@epa.gov) ]

\*Briefing materials should be submitted to [ [HYPERLINK "mailto:OAR\\_Briefings@epa.gov"](mailto:OAR_Briefings@epa.gov) ] by 3 pm one working day prior to the meeting

[ SEQ CHAPTER \h \r 1]OAQPS Meeting Request Form

For [REDACTED]

Do not use bold, highlight or underline text that you enter.

**Date of this Request:** 02/27/25

**Scheduling Point of Contact:** [REDACTED]

**Technical Point of Contact:** [REDACTED]

**Lead Technical Point of Contact:** [REDACTED]

**Subject:** Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension.

**Purpose:** Provide summary of EPA's 2024 Commercial Sterilizers NESHAP RTR rulemaking, litigation status and petitions, and discuss the CAA section 112(i)(4) Presidential compliance extension process.

- Next ADP Milestone: (specify early guidance, options selection, etc.); meeting scheduled on: \_\_/\_\_/\_\_;
- If applicable, due date to: OP / / ( days review); OMB: / / ( days review);
- Legal deadline: Settlement agreement due date is \_\_/\_\_/\_\_.
- Other firm deadline

**First possible date for meeting:** 3/3/2025 (note: from 4:00 to 4:45pm, if possible)

**Last possible date for meeting:** 3/3/2025

**Duration:** 45 minutes

**Requested Audio / Video** (Mark with "X" if requested)

☒ **Video Location(s):**

List video locations needed (e.g., Microsoft Office Teams, RTP, DC, Regions) HQ will set up a bridge if needed

☐ **HQ Conference Line:**

If requested, HQ staff will provide in meeting invite

☐ **Non-HQ Conference Line:**

If you plan to use a non-HQ conference line, include it here

**Invitees (please list by Office and in Outlook format, e.g. Last, First):**

Please include the key OGC and/or Regional representatives as appropriate. Only key invitees are listed by office; others are Cc:

Office/Org                      Name (Last, First)

OAQPS

[REDACTED]

OGC

[REDACTED]

Schedulers to Cc:

[REDACTED]

**HQ Meeting Briefing Materials: Must provide to OAQPS IO by Noon, 1 day before meeting.**

Revised 8/2021

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/21/2025 4:09:37 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Directions for Presidential Exemption Submissions

I added a bit from [REDACTED] email – sending on now.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:52 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: Directions for Presidential Exemption Submissions


This looks good to me [REDACTED]

Would you share with [REDACTED] and [REDACTED] and ask what the next steps are?

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:09 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Directions for Presidential Exemption Submissions

Heres a link for your review! I was envisioning language for use in an email and on a webpage. If anyone has any more specifics about what should be submitted, that would be awesome 😊

Including all but [REDACTED] on this draft.

 [Presidential Exemption Directions .docx](#)



Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/21/2025 4:29:11 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Directions for Presidential Exemption Submissions

Thanks [REDACTED] – I added a bit of this.


**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:53 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: Directions for Presidential Exemption Submissions

## Ex. 5 Deliberative Process (DP)

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:09 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Directions for Presidential Exemption Submissions

Heres a link for your review! I was envisioning language for use in an email and on a webpage. If anyone has any more specifics about what should be submitted, that would be awesome 🙌

Including all but [REDACTED] on this draft.

 [Presidential Exemption Directions .docx](#)

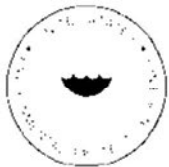
Message

From: [REDACTED]@epa.gov]  
Sent: 3/24/2025 3:02:55 PM  
To: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
CC: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov];  
[REDACTED]@epa.gov]  
Subject: RE: airaction@epa.gov -- announcing mailbox

Thanks for all this, [REDACTED] and [REDACTED] – I'll run it by leadership, noting that OAQPS is aiming for 3pm to post, flagging a few remaining questions (mainly who gets notified when, if at all), and of course, cc-ing [REDACTED]

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 10:51 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>  
Subject: RE: airaction@epa.gov -- announcing mailbox

Here is a link to the staged website and banner (with placeholder text for now): <https://www.epa.gov/node/83201/latest>  
We'll need to decide what we want in the blue announcement box.



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams  
Mobile: [REDACTED]  
Desk Phone: [REDACTED]  
Email: [REDACTED]

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 10:46 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: airaction@epa.gov -- announcing mailbox

Communication Strategy:

Ex. 5 Deliberative Process (DP)

Web text (and text for emails to stakeholders):

Ex. 5 Deliberative Process (DP)

Hi [REDACTED]

As we discussed, today at 3pm we will be prepared to post information in the banner of [this website](#) announcing that people can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for nine NESHAPS. These NESHAPS were identified in a 3/25 press release. The email box is live now and OAQPS staff have access to it.

Attached please find the text for the website and a draft communication strategy. We are still populating the industry notification list and welcome thoughts from others about who should be contacted. **Ex. 5 Deliberative Process (DP)**  
The communication strategy contemplates a desk statement, social media post, and notifications not a press release. There are a couple of questions in the communication strategy that we need some help answering.

Would you please copy [REDACTED] when you send this forward to OAR leadership?

Thanks,

\*\*\*\*\*

[REDACTED]  
Director  
Policy Analysis and Communications  
EPA's Office of Air Quality Planning and Standards

[REDACTED]  
Call me on Teams  
[REDACTED]@epa.gov

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 6:10:31 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Ready to send?

[REDACTED] incorporated my feedback, it's ready to go for HON.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:09 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Ready to send?

Are we ready to share this list with OAR leadership?

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 12:15 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>  
**Subject:** FOR REVIEW: Presidential Exemption - Notification List  
**Importance:** High

Hi Everyone,

At 3:00 today we are planning to announce the ability for industry to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act for nine of our air toxics rules:

- MATS
- HON
- EtO Sterilizers
- Rubber Tire Manufacturing
- Primary Copper Smelting
- Integrated Iron & Steel
- Lime Manufacturing
- Coke Ovens
- Taconite

I've assembled a notification list that I pulled from our communication plans for each rule announcement.

[Presidential Exemptions - Notification List.xlsx](#)

The biggest gap is for EtO Sterilizers, since we our notification lists were focused primarily on NGOs. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

The deadline is **ASAP**. My apologies for the short turnaround.

Thanks so much, and please let me know if you have any questions.



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED]

Message

---

From: [REDACTED]@epa.gov]  
Sent: 3/24/2025 7:55:42 PM  
To: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
CC: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
Subject: Re: Robin: Who would you like to send out the notifications?

I will send out

Get Outlook for iOS

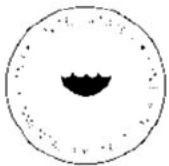
From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 3:26:58 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: [REDACTED] Who would you like to send out the notifications?

I added a pre-populated subject line to the email if that helps?

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams  
Mobile: [REDACTED]  
Desk Phone: [REDACTED]  
Email: [t1111111111@epa.gov](mailto:t1111111111@epa.gov)

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 3:24 PM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: Robin: Who would you like to send out the notifications?

[Presidential Exemptions - Notification List.xlsx](#)

[REDACTED]

Would you like to email the folks in the notification list linked below? Here is a draft note for your consideration.

Thanks,  
[REDACTED]

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>



Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 10:43:37 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

I will contact her tomorrow.

Get [Outlook for iOS](#)

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 5:49:59 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

It looks like Ross Templeton with the Ironworkers Union went to USDOT. The new Political and Legislative Director is Gina Maglionico. She started in March, so there's no email for her. Their main office phone is 202-383-4800.



[REDACTED]  
U.S. EPA  
OAR/OAQPS

[Call me on Teams](#)

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED]

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 5:37 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** FW: Presidential Exemption under CAA Section 112(i)(4)

One undeliverable so far. I also didn't have an email address for the Lime Association. I'm going to give the person a call right now.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@usepa.onmicrosoft.com>  
**Sent:** Monday, March 24, 2025 5:35 PM  
**To:** Dunkins, Robin  
**Subject:** Undeliverable: Presidential Exemption under CAA Section 112(i)(4)



Your message to [rtempleton@iwintl.org](mailto:rtempleton@iwintl.org) couldn't be delivered.

rtempleton wasn't found at iwintl.org, or the mailbox is unavailable.

#### Action Required

Unknown To address

Office 365

rtempleton  
Recipient

## How to Fix It

The email address might be misspelled or it might not exist. Try one or more of the following:

- **Retype the recipient's address, then resend the message** - If you're using Outlook, open this non-delivery report message and click **Send Again** from the menu or ribbon. In Outlook on the web, select this message, and then click the "**To send this message again, click here.**" link located just above the message preview window. In the To or Cc line, delete and then retype the entire recipient's address (ignore any address suggestions). After typing the complete address, click **Send** to resend the message. If you're using an email program other than Outlook or Outlook on the web, follow its standard way for resending a message. Just be sure to delete and retype the recipient's entire address before resending it.
- **Remove the recipient from the recipient Auto-Complete List, then resend the message** - If you're using Outlook or Outlook on the web, follow the steps in the "Remove the recipient from the recipient Auto-Complete List" section of [this article](#). Then resend the message. Be sure to delete and retype the recipient's entire address before clicking **Send**.
- **Contact the recipient by some other means**, (by phone, for example) to confirm you're using the right address. Ask them if they've set up an email forwarding rule that could be forwarding your message to an incorrect address.

If the problem continues, forward this message to your email admin. If you're an email admin, refer to the **More Info for Email Admins** section below.

Was this helpful? [Send feedback to Microsoft](#).

## More Info for Email Admins

Status code: 550 5.1.351

When Office 365 tried to send the message, the external email server returned an error stating that the recipient is unknown or the mailbox is unavailable. This error was reported by an email server outside Office 365.

**If you or the sender can't fix the problem, contact the responsible party's email admin** - Give them the error code and error message from this non-delivery report (NDR) to help them troubleshoot the issue. To determine who the responsible party might be, check the error for information about where the problem is happening. For example, look for a domain name like contoso.com. A domain name in the error might suggest who is responsible for the error. It could be the recipient's email server, or it could be a third-party service that your organization or the recipient's organization is using to process or filter email messages.

Although the sender might be able to fix the issue by correcting the recipient address, it's likely that only the recipient's email admin can fix the problem. Unfortunately, it's unlikely Office 365 Support will be able to help with these kinds of externally reported errors.

Original Message Details

Created Date: 3/24/2025 9:35:09 PM  
Sender Address: [REDACTED]@epa.gov  
Recipient Address: rtempleton@iwintl.org  
Subject: Presidential Exemption under CAA Section 112(i)(4)

Error Details

Error: 550 5.1.351 Remote server returned unknown recipient or mailbox unavailable -> 550 Invalid Recipient - [https://community.mimecast.com/docs/DOC-1369#550\[FULG\\_78bMZKUJFIRnA\\_TdA.us343\]](https://community.mimecast.com/docs/DOC-1369#550[FULG_78bMZKUJFIRnA_TdA.us343])  
Message rejected by: us-smtp-inbound-1.mimecast.com

Notification Details

Sent by: PH8PR09MB9805.namprd09.prod.outlook.com

Message Hops

HOP	TIME (UTC)	FROM	TO	WITH
1	3/24/2025 9:35:09 PM	DM8PR09MB7384.namprd09.prod.outlook.com	DM8PR09MB7384.namprd09.prod.outlook.com	mapi
2	3/24/2025 9:35:09 PM	DM8PR09MB7384.namprd09.prod.outlook.com	PH8PR09MB9805.namprd09.prod.outlook.com	Microsoft SMTP Server cipher=TLS_ECDHE_RS

Original Message Headers



DM6PR09MB736468EAD4DC11CEB87164E6E8A423DM6PR09MB7364.namprd09.prod.outlook.com

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that proper record-keeping is essential for transparency and accountability, particularly in financial matters.

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for reliable data sources and the importance of using appropriate statistical techniques to interpret the results.

3. The third part of the document focuses on the ethical considerations surrounding data collection and analysis. It discusses the potential for bias and the importance of ensuring that data is used responsibly and for its intended purpose.

4. The fourth part of the document provides a detailed overview of the specific steps involved in conducting a data analysis. It covers everything from data collection to the final interpretation of results, providing a clear and concise guide for anyone looking to perform a data analysis.

5. The fifth part of the document discusses the challenges and limitations of data analysis. It acknowledges that while data analysis can provide valuable insights, it is not without its challenges, such as the potential for data manipulation or the difficulty of interpreting complex data sets.

6. The sixth part of the document provides a summary of the key findings and conclusions of the study. It reiterates the importance of accurate record-keeping and the need for ethical data collection and analysis practices.

7. The seventh part of the document provides a list of references and sources used in the study. It includes a variety of academic papers, books, and other resources that provide further information on the topics discussed in the document.

8. The eighth part of the document provides a list of appendices and supplementary materials. These materials include additional data, charts, and tables that provide further detail and support for the findings of the study.

9. The ninth part of the document provides a list of acknowledgments and thanks. It expresses gratitude to the individuals and organizations that provided support and assistance throughout the study.

10. The tenth part of the document provides a list of contact information for the author and other relevant parties. This information is provided for those who may wish to contact the author for further information or to discuss the study in more detail.

1                    2                    3                    4                    5                    6                    7                    8                    9                    10                    11                    12                    13                    14                    15                    16                    17                    18                    19                    20                    21                    22                    23                    24                    25                    26                    27                    28                    29                    30                    31                    32                    33                    34                    35                    36                    37                    38                    39                    40                    41                    42                    43                    44                    45                    46 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                   1489                    1490                    1491                    1492                    1493                    1494                    1495                    1496

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 12:56:37 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

Sounds good, thanks!

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 8:56 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

I'm working from home this morning and should be in mid morning. I will figure out what time to call them once I'm in the office.

Thanks,  
[REDACTED]

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 8:39 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

Someone from PACS would be happy to help. I'll get back to you in a few hours if that's ok?

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 8:34 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** Fw: Presidential Exemption under CAA Section 112(i)(4)

Now the questions begin. Anyone want to sit in on this call with me?

Get Outlook for iOS

**From:** Tull, Whitney <Whitney.Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 8:23:52 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

██████████  
Thank you for your outreach. Do you have any time this morning to answer a few questions?  
Appreciate your time,  
Whitney

---

Whitney Tull

Vice President, Government Affairs

STERIS

1325 G St, NW, Ste 500

Washington, DC 20005

whitney\_tull@steris.com

Mobile: ██████████

[www.steris.com](http://www.steris.com)

**From:** ██████████ <██████████@epa.gov>

**Sent:** Monday, March 24, 2025 5:35 PM

**Subject:** Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-source-air-pollution/clean-air-act-section-112-presidential-exemption-information>

██████████ Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: ██████████ M: ██████████



[REDACTED]@epa.gov

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 2:52:58 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

Thanks, [REDACTED]. I'll come to your office.

Best,  
[REDACTED]

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:49 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** FW: Presidential Exemption under CAA Section 112(i)(4)

[REDACTED]  
I plan to call Whitney at noon time. Please stop by my office if you want to listen in on the call.

[REDACTED] the offer applies to you as well if you want to listen in on the call.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** Tull, Whitney <Whitney\_Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 10:47 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

[REDACTED]  
Thanks for your quick response. That would be great. You can reach me at 571-481-7906.  
Whitney

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:46 AM  
**To:** Tull, Whitney <Whitney\_Tull@steris.com>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

Whitney, can I call you around noon? I'm tied up in meetings this morning.

[REDACTED], Senior Advisor

Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]

**From:** Tull, Whitney <Whitney.Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 8:24 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

[REDACTED]  
Thank you for your outreach. Do you have any time this morning to answer a few questions?  
Appreciate your time,  
Whitney

---

Whitney Tull

Vice President, Government Affairs

STERIS

1325 G St, NW, Ste 500

Washington, DC 20005

whitney\_tull@steris.com

Mobile: [REDACTED]

[www.steris.com](http://www.steris.com)

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 5:35 PM  
**Subject:** Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED] [epa.gov](mailto:[REDACTED]@epa.gov)

Message

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 2:59:01 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

I will attend and give [REDACTED] the rundown.

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:57 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

I will not be able to attend, but adding [REDACTED] and [REDACTED] in case they want to listen in.



[REDACTED]  
U.S. EPA  
OAR/OAQPS  
Call me on Teams  
Mobile: [REDACTED]  
Desk Phone: [REDACTED]  
Email: [REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:49 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** Do, Bebhinn <do.bebhinn@epa.gov>  
**Subject:** FW: Presidential Exemption under CAA Section 112(i)(4)

[REDACTED]  
I plan to call Whitney at noon time. Please stop by my office if you want to listen in on the call.

[REDACTED] the offer applies to you as well if you want to listen in on the call.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** Tull, Whitney <Whitney.Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 10:47 AM

**To:** [REDACTED]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

[REDACTED]  
Thanks for your quick response. That would be great. You can reach me at [REDACTED]  
Whitney

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:46 AM  
**To:** Tull, Whitney <Whitney.Tull@steris.com>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

Whitney, can I call you around noon? I'm tied up in meetings this morning.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** Tull, Whitney <Whitney.Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 8:24 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

[REDACTED]  
Thank you for your outreach. Do you have any time this morning to answer a few questions?  
Appreciate your time,  
Whitney

Whitney Tull

Vice President, Government Affairs

STERIS

1325 G St, NW, Ste 500

Washington, DC 20005

[whitney.toll@states.com](mailto:whitney.toll@states.com)

Mobile: [REDACTED]

[www.state@epa.gov](mailto:www.state@epa.gov)

**From:** [REDACTED] <[\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)>

**Sent:** Monday, March 24, 2025 5:35 PM

**Subject:** Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airquality@epa.gov](mailto:airquality@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/surfaceair-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov



Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 3:00:21 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

I just left a voicemail message at the number provided.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 5:53 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

If their email convention is the same, you could try [gmaglionico@iwintl.org](mailto:gmaglionico@iwintl.org)



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

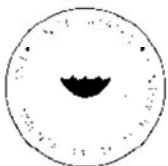
Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED]@epa.gov

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 5:50 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

It looks like Ross Templeton with the Ironworkers Union went to USDOT. The new Political and Legislative Director is Gina Maglionico. She started in March, so there's no email for her. Their main office phone is 202-383-4800.



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]  
Email: [REDACTED]@epa.gov

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 5:37 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: FW: Presidential Exemption under CAA Section 112(i)(4)

One undeliverable so far. I also didn't have an email address for the Lime Association. I'm going to give the person a call right now.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@usepa.onmicrosoft.com>  
Sent: Monday, March 24, 2025 5:35 PM  
To: [REDACTED]  
Subject: Undeliverable: Presidential Exemption under CAA Section 112(i)(4)

Your message to [rtempleton@iwintl.org](mailto:rtempleton@iwintl.org) couldn't be delivered.

[rtempleton](mailto:rtempleton@iwintl.org) wasn't found at [iwintl.org](http://iwintl.org), or the mailbox is unavailable.

[REDACTED]	Office 365	rtempleton
Action Required		Recipient
[REDACTED]		
Unknown To address		

## How to Fix It

The email address might be misspelled or it might not exist. Try one or more of the following:

- **Retype the recipient's address, then resend the message** - If you're using Outlook, open this non-delivery report message and click **Send Again** from the menu or ribbon. In Outlook on the web, select this message, and then click the "**To send this message again, click here.**" link located just above the message preview window. In the To or Cc line, delete and then retype the entire recipient's address (ignore any address suggestions). After typing the complete address, click **Send** to resend the

message. If you're using an email program other than Outlook or Outlook on the web, follow its standard way for resending a message. Just be sure to delete and retype the recipient's entire address before resending it.

- **Remove the recipient from the recipient Auto-Complete List, then resend the message** - If you're using Outlook or Outlook on the web, follow the steps in the "Remove the recipient from the recipient Auto-Complete List" section of [this article](#). Then resend the message. Be sure to delete and retype the recipient's entire address before clicking **Send**.
- **Contact the recipient by some other means**, (by phone, for example) to confirm you're using the right address. Ask them if they've set up an email forwarding rule that could be forwarding your message to an incorrect address.

If the problem continues, forward this message to your email admin. If you're an email admin, refer to the **More Info for Email Admins** section below.

*Was this helpful? [Send feedback to Microsoft](#).*

## More Info for Email Admins

Status code: 550 5.1.351

When Office 365 tried to send the message, the external email server returned an error stating that the recipient is unknown or the mailbox is unavailable. This error was reported by an email server outside Office 365.

**If you or the sender can't fix the problem, contact the responsible party's email admin** - Give them the error code and error message from this non-delivery report (NDR) to help them troubleshoot the issue. To determine who the responsible party might be, check the error for information about where the problem is happening. For example, look for a domain name like contoso.com. A domain name in the error might suggest who is responsible for the error. It could be the recipient's email server, or it could be a third-party service that your organization or the recipient's organization is using to process or filter email messages.

Although the sender might be able to fix the issue by correcting the recipient address, it's likely that only the recipient's email admin can fix the problem. Unfortunately, it's unlikely Office 365 Support will be able to help with these kinds of externally reported errors.

### Original Message Details

Created Date: 3/24/2025 9:35:09 PM  
Sender Address: [REDACTED]@epa.gov  
Recipient Address: [rtempleton@iwintl.org](mailto:rtempleton@iwintl.org)  
Subject: Presidential Exemption under CAA Section 112(i)(4)

### Error Details

Error: 550 5.1.351 Remote server returned unknown recipient or mailbox unavailable -> 550 Invalid Recipient - [https://community.mimecast.com/docs/DOC-1369#550\[FULG\\_78bMZKUJFIRnA\\_TdA.us343\]](https://community.mimecast.com/docs/DOC-1369#550[FULG_78bMZKUJFIRnA_TdA.us343])  
Message rejected by: us-smtp-inbound-1.mimecast.com

### Notification Details

Sent by: PH8PR09MB9805.namprd09.prod.outlook.com

## Message Hops

HOP	TIME (UTC)	FROM	TO	WITH
1	3/24/2025 9:35:09 PM	DM8PR09MB7384.namprd09.prod.outlook.com	DM8PR09MB7384.namprd09.prod.outlook.com	mapi
2	3/24/2025 9:35:09 PM	DM8PR09MB7384.namprd09.prod.outlook.com	PH8PR09MB9805.namprd09.prod.outlook.com	Microsoft SMTP Serve cipher=TLS ECDHE RS

### Original Message Headers



DM3PR09MB739498EAD4D011CEB87164E6E8A423DM3PR09MB7384.namprd09.prod.outlook.com







Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CE5A954491DF4DD2A084BA58FEAA11DE-[REDACTED]]  
**Sent:** 3/21/2025 4:33:35 PM  
**To:** [REDACTED]@epa.gov  
**Subject:** RE: Web and/or email instructions for submitting Presidential Exemption requests  
**Attachments:** 2025.03.21\_Presidential Exemption Directions .docx

Static copy attached.

Best,

OAR/OAQPS

Office: [REDACTED] cell: [REDACTED]  
[REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 12:30 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: Web and/or email instructions for submitting Presidential Exemption requests

This works for me. [REDACTED] is there anything missing that we should add. I'm pretty sure we will be asked to provide more specifics on what justifications should be included [REDACTED] **Ex. 5 Deliberative Process (DP)** [REDACTED] I think our leadership may add that in.

If everyone's comfortable with this I will send forward to Aaron for his review.

[REDACTED] Senior Advisor  
 Office of Air Quality Planning and Standards  
 U.S. Environmental Protection Agency  
 109 T.W. Alexander Drive  
 Research Triangle Park, NC 27711  
 O: [REDACTED] M: [REDACTED]  
 [REDACTED]@epa.gov

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 12:13 PM  
**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** Web and/or email instructions for submitting Presidential Exemption requests

- Here is a draft for your review. The email account is already functioning.

Please let us know what the next steps are. - j

**W- Presidential Exemption Directions .docx**

Desk: [REDACTED]  
Cell: [REDACTED]

**Assuring that the Presidential Exemption is Accessible**

# **Ex. 5 Deliberative Process (DP)**

Message

From: [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CE5A954491DF4DD2A084BA5BEFAA11DE-[REDACTED]]  
Sent: 3/21/2025 4:33:45 PM  
To: [REDACTED]@epa.gov; [REDACTED]@epa.gov  
CC: [REDACTED]@epa.gov  
Subject: RE: Web and/or email instructions for submitting Presidential Exemption requests

Works for me as well.

Best,  
[REDACTED]

---

OAR/OAOPS

Office: [REDACTED] cell: [REDACTED]  
[REDACTED]@epa.gov

From: [REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 12:30 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: RE: Web and/or email instructions for submitting Presidential Exemption requests

This works for me. [REDACTED] is there anything missing that we should add. I'm pretty sure we will be asked to provide more specifics on what justifications should be included but **Ex. 5 Deliberative Process (DP)** I think our leadership may add that in.

If everyone's comfortable with this I will send forward to Aaron for his review.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: [REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 12:13 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: Web and/or email instructions for submitting Presidential Exemption requests

[REDACTED] and [REDACTED] – Here is a draft for your review. The email account is already functioning.

Please let us know what the next steps are. - j

[Presidential Exemption Directions .docx](#)

Jan Cortelou-Lee

Desk:

Cell:

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/11/2025 7:56:09 PM  
**To:** [REDACTED]@epa.gov]

This meeting is linked with Hybrid: Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension on Friday a 3:30. They are related and there are a lot of questions on the topic that need to be sorted through for next steps.

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50505AF25AF94494AD34EE072A4F1E45-[REDACTED]]  
**Sent:** 3/20/2025 3:08:25 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** call me back when you get a minute

I have a question about the March 31<sup>st</sup> deadline Aaron kept mentioning. I don't know where that comes from. Is that specifically for the requests for the presidential exemption? I've looked thru materials and I don't see that date anywhere.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov



Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50505AF25AF94494AD34EE072A4F1E45-[REDACTED]]  
**Sent:** 3/21/2025 4:49:52 PM  
**To:** Szabo, Aaron [Szabo.Aaron@epa.gov]  
**CC:** [REDACTED]@epa.gov]; Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]  
**Subject:** email address for Presidential exemption requests  
**Attachments:** 2025.03.21\_Presidential Exemption Directions .docx

Aaron,

Per your request, we've have an email box dedicated to receive exemption requests under 112(i)(4). I'm attaching a short narrative to provide a bit more detail including the email address. One point to note for you is **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50505AF25AF94494AD34EE072A4F1E45-[REDACTED]]  
**Sent:** 3/24/2025 12:23:22 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** Test  
**Attachments:** 112 Presidential Exemptions -- announcing process -- Com Strategy.docx

Get Outlook for iOS

3/21/25

Draft

Communication Strategy

**Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption  
under section 112(i)(4) of the Clean Air Act**

**Desk Statement**

# **Ex. 5 Deliberative Process (DP)**

**Background**

# **Ex. 5 Deliberative Process (DP)**

## **Ex. 5 Deliberative Process (DP)**

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 7:55:42 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** Re: Robin: Who would you like to send out the notifications?

I will send out

Get Outlook for iOS

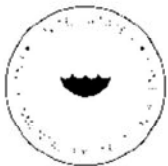
**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 3:26:58 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: Robin: Who would you like to send out the notifications?

I added a pre-populated subject line to the email if that helps?

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 3:24 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Robin: Who would you like to send out the notifications?

[Presidential Exemptions - Notification List.xlsx](#)

[REDACTED]

Would you like to email the folks in the notification list linked below? Here is a draft note for your consideration.

Thanks,  
[REDACTED]

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50505AF25AF94494AD34EE072A4F1E45-[REDACTED]]  
**Sent:** 3/24/2025 9:39:49 PM  
**To:** Paul Balserak [pbalserak@steel.org]  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

You are welcome.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** Paul Balserak <pbalserak@steel.org>  
**Sent:** Monday, March 24, 2025 5:36 PM  
**To:** [REDACTED]@epa.gov  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

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

Thank you, [REDACTED]  
Paul

Paul Balserak  
Vice President, Environment  
American Iron and Steel Institute  
25 Massachusetts Ave. NW, Suite 800  
Washington, DC 20001  
[REDACTED] (mobile)

**From:** [REDACTED]@epa.gov  
**Sent:** Monday, March 24, 2025 5:35 PM  
**Subject:** [EXT] Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED] [\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)

This email is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing or other use of this email by persons or entities other than the addressee is prohibited. If you have received this email in error, please contact the sender immediately, and delete the material from your computer.



Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50505AF25AF94494AD34EE072A4F1E45-[REDACTED]]  
**Sent:** 3/25/2025 2:46:02 PM  
**To:** Tull, Whitney [Whitney\_Tull@steris.com]  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

Whitney, can I call you around noon? I'm tied up in meetings this morning.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** Tull, Whitney <Whitney\_Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 8:24 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

[REDACTED]  
Thank you for your outreach. Do you have any time this morning to answer a few questions?  
Appreciate your time,  
Whitney

Whitney Tull

Vice President, Government Affairs

STERIS

1325 G St. NW, Ste 500

Washington, DC 20005

[whitney\\_tull@steris.com](mailto:whitney_tull@steris.com)

Mobile: [REDACTED]

[www.steris.com](http://www.steris.com)

**From:** [REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 5:35 PM

**Subject:** Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemptions-information>

[REDACTED] Senior Advisor

Office of Air Quality Planning and Standards

U.S. Environmental Protection Agency

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

O: [REDACTED] M: [REDACTED]

[REDACTED]@epa.gov

Message

---

**From:** [REDACTED]/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50505AF25AF94494AD34EE072A4F1E45-[REDACTED]  
**Sent:** 3/25/2025 3:08:46 PM  
**To:** Tull, Whitney [Whitney\_Tull@steris.com]  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

I will give you a call. I may have one or two from my team on the call as this process is evolving quickly. Look forward to talking to you later.

Thanks  
[REDACTED]

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** Tull, Whitney <Whitney\_Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 10:47 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

[REDACTED]  
Thanks for your quick response. That would be great. You can reach me at [REDACTED]  
Whitney

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:46 AM  
**To:** Tull, Whitney <Whitney\_Tull@steris.com>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

Whitney, can I call you around noon? I'm tied up in meetings this morning.

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** Tull, Whitney <Whitney.Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 8:24 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

Thank you for your outreach. Do you have any time this morning to answer a few questions?  
Appreciate your time,  
Whitney

---

Whitney Tull

Vice President, Government Affairs

STERIS

1325 G St, NW, Ste 500

Washington, DC 20005

[whitney.tull@steris.com](mailto:whitney.tull@steris.com)

Mobile: [REDACTED]

[www.42ufc.com](https://www.42ufc.com)

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 5:35 PM  
**Subject:** Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards

U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711

O: [REDACTED] M: [REDACTED]  
[REDACTED] [epa.gov](http://epa.gov)

**Assuring that the Presidential Exemption is Accessible**

## **Ex. 5 Deliberative Process (DP)**

**Formatted:** List Paragraph, Bulleted + Level: 1 +  
**Aligned at:** 0.25' + **Indent at:** 0.5'

## Ex. 5 Deliberative Process (DP)

Formatted: highlight

Formatted: highlight

Message

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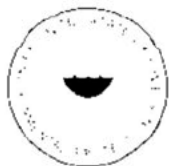
**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 7:13:29 PM  
**To:** [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Presidential Exemption Web Pages Ready for Posting

I forwarded a note to OPA and OPE, so you'd see that they were looped in – thanks!

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 3:04 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: Presidential Exemption Web Pages Ready for Posting

Everything is posted. Please let me know if you have any additional changes or updates.

Thanks!



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:44 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: Presidential Exemption Web Pages Ready for Posting

We got Aaron's good to go, so we're on for 3pm – thanks, [REDACTED]

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:37 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Presidential Exemption Web Pages Ready for Posting

Hi [REDACTED]

The web pages for the announcement are ready for posting. Again, the links are:

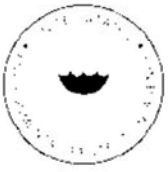
<https://www.epa.gov/node/83201/revisions/2538570/view>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

Unless I hear otherwise, I will post these at 3:00. Again, if you have any issues accessing the pages, let me know and I can run through it with you via Teams.



Thanks!



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED] [\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)

Message

---

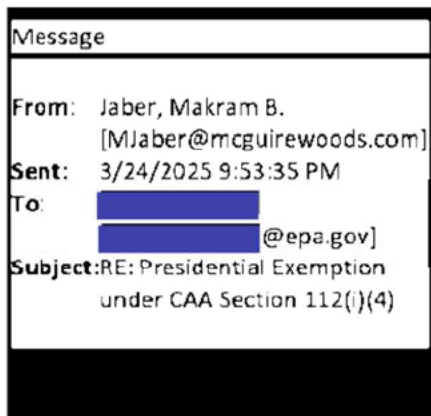
**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 9:35:09 PM  
**Subject:** Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov



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

Thank you.

**Makram B. Jaber** 嘉

Partner

McGuireWoods LLP

T: [redacted] M: [redacted]  
[mjaber@mcguirewoods.com](mailto:mjaber@mcguirewoods.com)

From: [redacted]@epa.gov>  
Sent: Monday, March 24, 2025 5:35 PM  
Subject: Presidential Exemption under CAA Section 112(i)(4)

**\*\*EXTERNAL EMAIL; use caution with links and attachments\*\***

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

[redacted], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency

109 T.W. Alexander Drive  
Research Triangle Park, NC 27711

[REDACTED]  
[REDACTED] [epa.gov](http://www.epa.gov)

*This e-mail from McGuireWoods may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading or forwarding to others.*

Message

**From:** Calleja, Khaterreh  
[KCalleja@advamed.org]  
**Sent:** 3/25/2025 2:25:20 PM  
**To:** [REDACTED]  
[REDACTED]@epa.gov]  
**Subject:** RE: [EXTERNAL]  
Presidential Exemption  
under CAA Section  
112(i)(4)

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

Hi Ms. [REDACTED],

Thank you for the update.

Best Regards,  
Khaterreh

Khaterreh R. Calleja, JD  
Senior Vice President and Department Deputy, Technology and Regulatory Affairs  
Advanced Medical Technology Association (AdvaMed)  
1301 Pennsylvania Ave, NW, Suite 400  
Washington, DC 20004  
[kcalleja@advamed.org](mailto:kcalleja@advamed.org)  
[REDACTED]

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 5:35 PM  
**Subject:** [EXTERNAL] Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
[REDACTED]  
[REDACTED]@epa.gov

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 2:51:02 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

thanks

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:48 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** FW: Presidential Exemption under CAA Section 112(i)(4)

FYI

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
[REDACTED]  
[REDACTED]@epa.gov

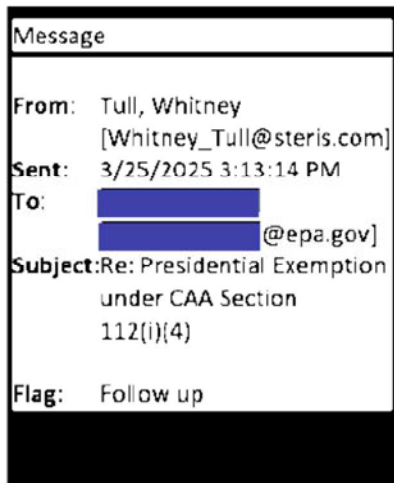
**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 5:35 PM  
**Subject:** Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airquality@epa.gov](mailto:airquality@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
[REDACTED]  
[REDACTED]@epa.gov



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

Thanks, [redacted].  
Sounds good.

**From:** [redacted]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 11:08 AM  
**To:** Tull, Whitney <Whitney\_Tull@steris.com>  
**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

I will give you a call. I may have one or two from my team on the call as this process is evolving quickly. Look forward to talking to you later.

Thanks  
[redacted]

[redacted], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
[redacted]  
[redacted]@epa.gov

**From:** Tull, Whitney <Whitney\_Tull@steris.com>  
**Sent:** Tuesday, March 25, 2025 10:47 AM  
**To:** [redacted]@epa.gov>  
**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

[redacted],  
Thanks for your quick response. That would be great. You can reach me at 571-481-7906.  
Whitney

**From:** [redacted] [redacted]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:46 AM

**To:** Tull, Whitney <Whitney.Tull@steris.com>

**Subject:** RE: Presidential Exemption under CAA Section 112(i)(4)

Whitney, can I call you around noon? I'm tied up in meetings this morning.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
[REDACTED]  
[REDACTED]@epa.gov

**From:** Tull, Whitney <Whitney.Tull@steris.com>

**Sent:** Tuesday, March 25, 2025 8:24 AM

**To:** [REDACTED] <[REDACTED]>

**Subject:** Re: Presidential Exemption under CAA Section 112(i)(4)

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

[REDACTED]  
Thank you for your outreach. Do you have any time this morning to answer a few questions?  
Appreciate your time,  
Whitney

Whitney Tull  
Vice President, Government Affairs  
STERIS  
1325 G St, NW, Ste 500  
Washington, DC 20005  
whitney.tull@steris.com  
Mobile: [REDACTED]  
[REDACTED]

**From:** [REDACTED] <[REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 5:35 PM

**Subject:** Presidential Exemption under CAA Section 112(i)(4)

Hello --

EPA wanted to share with you information about submitting a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4). Requests can be emailed to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The link below provides more information:

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>



[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711

[REDACTED]  
[REDACTED] [\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7AD6F4A11064EF08CB03AEC9DC8E892 [REDACTED]]  
**Sent:** 3/24/2025 5:11:24 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** Can you take a look at the website updates?

Let me know if the text and page titles are correct:

<https://www.epa.gov/node/87201/latest>

<https://www.epa.gov/stationary-sources-air-pollution/assuring-presidential-exemption-accessible>

Also, I can add some code so when someone clicks on the email link it will populate the subject line. Would you want it to be: **Presidential Exemption: [Name of Regulation]: [Facility(ies) Name]**



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Email: [REDACTED]@epa.gov

Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7AD6F4A11064EF08CB03AEC9DC8E892-[REDACTED]]  
**Sent:** 3/24/2025 5:45:38 PM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**CC:** [REDACTED]@epa.gov  
**Subject:** RE: airaction@epa.gov -- announcing mailbox

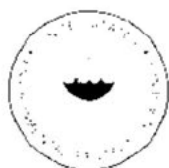
Here are links to the updated home page and the new web page:

<https://www.epa.gov/node/84201/revisions/2538570/view>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

Let me know if you have any issues accessing the pages. Since they're not posted yet, it may not open on your system.

## Ex. 5 Deliberative Process (DP)



U.S. EPA  
OAR/OAQPS

Call me on Teams

Email: [REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:44 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: airaction@epa.gov -- announcing mailbox

How about this for the text of the box?

Text: Request a Presidential Exemption under section 112(i)(4) of the Clean Air Act for certain National Emission Standards for Hazardous Air Pollutants by March 31, 2025.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 10:51 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Cc: [REDACTED]

**Subject:** RE: [airaction@epa.gov](mailto:airaction@epa.gov) -- announcing mailbox

Here is a link to the staged website and banner (with placeholder text for now): <https://www.epa.gov/node/83201 latest>  
We'll need to decide what we want in the blue announcement box.



U.S. EPA  
OAR/OAQPS

Call me on Teams

Email: [REDACTED]@epa.gov

**From:** [REDACTED] <[REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 10:46 AM

**To:** [REDACTED] <Millett.Johna@epa.gov>

**Cc:** [REDACTED]

**Subject:** RE: [airaction@epa.gov](mailto:airaction@epa.gov) -- announcing mailbox

Communication Strategy: [REDACTED] 112 Presidential Exemptions -- announcing process -- Com Strategy.docx

Web text (and text for emails to stakeholders) - [REDACTED] 2025.03.21 Presidential Exemption Directions\_ Egdits.docx

Hi [REDACTED] -

As we discussed, today at 3pm we will be prepared to post information in the banner of this website announcing that people can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for nine NESHAPS. These NESHAPS were identified in a 3/25 press release. The email box is live now and OAQPS staff have access to it.

Attached please find the text for the website and a draft communication strategy. We are still populating the industry notification list and welcome thoughts from others about who should be contacted. **Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)** The communication strategy contemplates a desk statement, social media post, and notifications not a press release. There are a couple of questions in the communication strategy that we need some help answering.

Would you please copy [REDACTED] when you send this forward to OAR leadership?

Thanks,

[REDACTED]

\*\*\*\*\*

Director

Policy Analysis and Communications

EPA's Office of Air Quality Planning and Standards

[REDACTED]

[REDACTED]

Call me on Teams

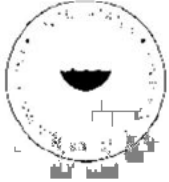
[REDACTED] [\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7AD6F4A11064EF08CB03AEC9DC8E892-[REDACTED]  
**Sent:** 3/24/2025 6:25:08 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** RE: Ready to send?

Yes, will do.



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams  
Mobile: 919.321.7652  
Desk Phone: 919.541.9424  
Email: [REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:12 PM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Fw: Ready to send?

Around 2:30, would you send what we have to Millett with a copy to Robin and mc?

\*\*\*\*\*

[REDACTED]  
Director  
Policy Analysis and Communications  
EPA's Office of Air Quality Planning and Standards  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 2:08:43 PM

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Ready to send?

Are we ready to share this list with OAR leadership?

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 12:15 PM  
**To:** [REDACTED]

**Subject:** FOR REVIEW: Presidential Exemption - Notification List


**Importance:** High

Hi Everyone,

At 3:00 today we are planning to announce the ability for industry to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act for nine of our air toxics rules:

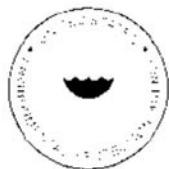
- MATS
- HON
- EtO Sterilizers
- Rubber Tire Manufacturing
- Primary Copper Smelting
- Integrated Iron & Steel
- Lime Manufacturing
- Coke Ovens
- Taconite

I've assembled a notification list that I pulled from our communication plans for each rule announcement.

 Presidential Exemptions - Notification List.xlsx

**Ex. 5 Deliberative Process (DP)** Could you have your folks take a look at these and have them (1) add any additional industry contacts, and (2) ensure the list is up to date? The deadline is **ASAP**. My apologies for the short turnaround.

Thanks so much, and please let me know if you have any questions.



[Redacted]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [Redacted]

Desk Phone: [Redacted]

Email: [Redacted]

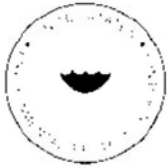
[Redacted]  
@epa.gov

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7AD6F4A11064EF08CB03AEC9DC8E892-KBREMER]  
**Sent:** 3/24/2025 7:24:18 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** RE: And add date

Done!



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Email: [REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 3:22 PM  
**To:** [REDACTED]@epa.gov>  
**Subject:** And add date

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 3:21 PM  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** Changing a few words

... may submit a request for a Presidential Exemption to this email address ~~using this link:~~ [airactions@epa.gov](mailto:airactions@epa.gov) by March 31, 2025.

Could you make these edits?

Thanks,  
Jenny

\*\*\*\*\*

[REDACTED]  
Director  
Policy Analysis and Communications  
EPA's Office of Air Quality Planning and Standards

Call me on Teams  
[REDACTED]@epa.gov



Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/21/2025 8:14:53 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** [REDACTED] shared "2025.03.21\_Presidential Exemption Directions\_ Edits" with you

-->



[REDACTED] invited you to edit a file

-->

Here's the document that [REDACTED] shared with you.

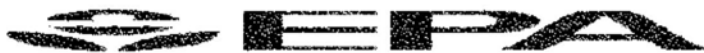


2025.03.21\_Presidential Exemption Directions\_ Edits



This invite will only work for you and people with existing access.

Ex. 6 Personal Privacy (PP)



[Privacy Statement](#)

This email is generated through Environmental Protection Agency (EPA)'s use of Microsoft 365 and may contain content that is controlled by Environmental Protection Agency (EPA).

Message

---

From: [REDACTED]@epa.gov]  
Sent: 3/24/2025 2:40:12 PM  
To: [REDACTED]@epa.gov]  
CC: [REDACTED]@epa.gov]  
Subject: RE: Presidential Exemption -- text and communication plan

Agree! Have you seen that date written down anywhere? We are still trying to find if there is a fact sheet that was generated for the 3/12 announcement. [REDACTED] is going to call you for a list of folks to notify about this email box. We're planning to go live at 3pm today with web text "announcing" the email box.

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 9:59 AM  
To: [REDACTED]@epa.gov>  
Subject: RE: Presidential Exemption -- text and communication plan

### Ex. 5 Deliberative Process (DP)

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 9:54 AM  
To: [REDACTED]@epa.gov>  
Subject: RE: Presidential Exemption -- text and communication plan

Do you have something in writing about when the deadline is?

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 9:50 AM  
To: [REDACTED]@epa.gov>  
Subject: RE: Presidential Exemption -- text and communication plan

Hi [REDACTED],

I hope you had a nice weekend! Our GLs are wondering about communication with industry stakeholders about this

## Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) ?


Best,

From: [REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 4:27 PM  
To: Dunkins, Robin <Dunkins.Robin@epa.gov>  
Cc: [REDACTED]

Subject: Presidential Exemption -- text and communication plan

Hi [REDACTED]

Here are some materials for a Monday afternoon announcement of the email box.

Communication strategy:  112 Presidential Exemptions -- announcing process -- Com Strategy.docx  
Web text/email: Attached as a static file

We recommend posting the announcement here. We're working on a new banner that will link to a new page.

<https://www.epa.gov/stationary-sources-air-pollution>

On Monday, we can also put a link on each of the nine NESHAP pages from the March 12<sup>th</sup> announcement.

Have a great weekend!

Thanks,

\*\*\*\*\*

[REDACTED]  
Director  
Policy Analysis and Communications  
EPA's Office of Air Quality Planning and Standards

[REDACTED]  
[REDACTED]  
Call me on Teams

[REDACTED]@epa.gov

Message

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 4:19:11 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov];  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: FOR REVIEW: Presidential Exemption - Notification List

Adding [REDACTED] (Acting MICG CL)

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 12:15 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** FOR REVIEW: Presidential Exemption - Notification List  
**Importance:** High

Hi Everyone,

At 3:00 today we are planning to announce the ability for industry to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act for nine of our air toxics rules:

- MATS
- HON
- EtO Sterilizers
- Rubber Tire Manufacturing
- Primary Copper Smelting
- Integrated Iron & Steel
- Lime Manufacturing
- Coke Ovens
- Taconite

I've assembled a notification list that I pulled from our communication plans for each rule announcement.

[Ex. 5 Presidential Exemptions - Notification List.xlsx](#)

**Ex. 5 Deliberative Process (DP)**

Could you have your folks take a look at these and have them (1) add any additional industry contacts, and (2) ensure the list is up to date? The deadline is **ASAP**. My apologies for the short turnaround.

Thanks so much, and please let me know if you have any questions.



U.S. EPA  
OAR/OAQPS

Call me on Teams

[REDACTED]  
[REDACTED]@epa.gov





H. Max Kellin  
Partner  
h.max.kellin@faegredrinker.com  
direct

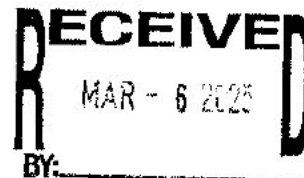
faegredrinker.com

Faegre Drinker Biddle & Reath LLP  
300 North Meridian Street, Suite 2500  
Indianapolis, Indiana 46204  
+1 317 237 0300 main  
+1 317 237 1000 fax

February 21, 2025

**VIA U.S. MAIL**

Hon. Lee Zeldin  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460



Re: Relief for Medical Device Manufacturers under Revised Commercial Sterilizer Ethylene Oxide NESHAP (40 CFR part 63, subpart O)

Dear Administrator Zeldin:

I am writing on behalf of a medical manufacturing device facility with an onsite sterilizer subject to the revised National Emission Standards for Hazardous Air Pollutants (NESHAP) for Commercial Sterilizers (40 CFR Part 63, Subpart O) published in the Federal Register on April 5, 2024. As described in more detail below, we respectfully petition the EPA to exercise its authority under the Clean Air Act to minimize the burden on manufacturing facilities covered by the rule and ensure the availability of sterilized medical devices necessary for patient care across the United States.

As you know, the revised Air Toxics Standards for Ethylene Oxide Commercial Sterilizers strengthened current standards and established new standards for previously unregulated emissions. Importantly, this rule requires the implementation of a permanent total enclosure (PTE) to capture all fugitive emissions, no matter how minimal, from handling sterilized material. As EPA acknowledged in its rulemaking, most facilities were not initially designed to implement PTE, which "will likely require redesign of a portion if not all" of these facilities to comply. Inevitably, many facilities will either need to cease or reduce operations to implement these upgrades.<sup>1</sup> These challenges are exacerbated for manufacturing facilities whose operations include sterilization because they have been set up to optimize efficient product flow.<sup>2</sup> While we fully support the goal of protecting public health and the environment, the current implementation timeline and lack of clarity around the exemption request process are causing a significant concern.

While certain requirements do not take effect until 2027, most existing facilities must comply by April 6, 2026, and demonstrate compliance one hundred and eighty days thereafter. Many impacted facilities, including those manufacturing medical devices, previously told EPA that this was insufficient time. Indeed, EPA's final rulemaking said that they "believe" facilities will be able to comply without "substantial" interruption if they commenced work *immediately* after the rule

<sup>1</sup> Proposed Rule at 22,853.

<sup>2</sup> Summary of EPA Response 4-48 to Comments.



became effective. For those working to implement this rule, it has become clear that EPA underestimated the potential disruption.

Knowing that the two-year implementation period may be insufficient, impacted facilities awaited further details referenced in the final rule regarding potential compliance exemptions. However, those details were not announced until January 2025 and only provided for a burdensome process that did not allow facilities to request an exemption until twelve months before their compliance deadline, which is likely too late. Although we are unaware of any official announcements regarding this memorandum, we assume it has either been rescinded or is no longer operative. To adequately plan their operations in the future, including whether onsite sterilization operations will need to cease or be relocated, clarification is required for applying for an exemption, the criteria for approval, and how long it will take to receive a decision.

Given the urgency, we respectfully ask the EPA to consider the following to ensure timely decisions to prevent any potential supply chain disruptions of sterilized medical products that could compromise patient care:

1. **Guidance for Non-Routine Sterilized Material Handling:** To reduce the burden on facilities covered by the rule whose primary purpose is to manufacture medical devices, issue interpretative guidance that handling of individual sterilized products outside the normal flow of material between sterilization and shipment for which representative area sampling is non-detect are presumed not to have fugitive emissions and therefore are not within the scope of the definition of Group 1 and Group 2 Air Emissions. This would eliminate the need to implement costly enclosures for areas of the facility, such as R&D or QA/QC, that do not handle sterilized materials in bulk and with no discernable reduction in emissions.
2. **Demonstration of Compliance:** Clarify that no facility will be held responsible for any aspect of the rule, even those for PTE, until after the 180-day relevant compliance period to demonstrate compliance under 40 CFR 63.7(a)(2).
3. **Alignment of Compliance Deadlines:** To avoid conflicting compliance deadlines, the EPA should interpret the revised NESHAP to allow facilities to comply with whichever applicable deadline is the longest. For instance, facilities using less than 10 tons per year of EtO should have an extra year to meet Group 2 and SCV requirements, aligning with the April 5, 2027, ARV, CEV, and Group 1 Air Emissions deadline.
4. **Temporary Pause on Implementation:** Issue a temporary pause on the implementation of the NESHAP (and commencement of the 180-day period to demonstrate compliance) until the exemption process is fully established and communicated to all affected facilities. EPA should also encourage delegated states to use their authority to extend compliance for one year to allow the EPA to develop a process for requesting and obtaining a compliance exemption under the Clean Air Act.
5. **Establishment of a Streamlined Compliance Exemption Process:** Provide detailed guidance as soon as possible for how facilities can apply for an exemption under the Clean Air Act, including the specific criteria for consideration and the timeline for decision-making. Given that the EPA already has voluminous information from most sterilization facilities through Section 114 Information Requests (and has toured many of them), EPA should be able to commit to notifying applicants of any exemption determinations within 30 days.
6. **Enforcement Discretion:** Use EPA's enforcement discretion to toll the compliance period while any exemption application is pending and not include any such period in the 180-day computation to demonstrate compliance. Any approvals should be retroactive to the



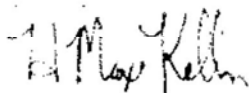
February 21, 2025

beginning of the compliance period, and enforcement discretion should be used for any facilities that may have applied for an exemption and were denied.

7. **Special Consideration for Low-Risk Operations:** In issuing guidance and implementing the process for obtaining exemptions, EPA should give special consideration to facilities with low or minimal EtO emissions, including those that use less than 10 TPY and have *de minimis* fugitive emissions.

These steps are necessary to balance reducing EtO emissions with maintaining the availability of life-saving medical devices. We look forward to your prompt attention and request a meeting at your earliest convenience to discuss a workable path forward.<sup>3</sup>

Sincerely,



H. Max Kelln

HK/

cc: Eric Amidon (Amidon.Eric@epa.gov)  
Travis Voyles (voyles.travis@epa.gov)  
Abigale Tardif (Tardif.Abigale@epa.gov)  
Alex Dominguez (dominguez.alexander@epa.gov)  
[REDACTED]@EPA.gov

---

<sup>3</sup> Alternatively, if the EPA interprets its inherent authority under the Clean Air Act to grant discretionary exemptions on a case-by-case basis without formally issuing any updated guidance, we can discuss the appropriate next steps for our clients that have expressed interest.



Faegre Drinker Biddle & Reath LLP  
300 N. Meridian Street, Suite 2500  
Indianapolis, Indiana 46204

Hon. Lee Zeldin Administrator U.S.  
Environmental Protection Agency  
1200 Pennsylvania Avenue,  
NW Washington, D.C. 20460



2025-03-06 13:55

MAR 06 2025

Message

---

From: [REDACTED]@epa.gov]

Sent: 3/24/2025 4:54:47 PM

To: [REDACTED]

CC:

Subject: RE: FOR REVIEW: Presidential Exemption - Notification List

+ [REDACTED]



[REDACTED]  
Environmental Protection Specialist (*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS SPPD PSG

Phone : [REDACTED]  
Mobile : [REDACTED]  
Email: [REDACTED]@epa.gov

From: [REDACTED]@epa.gov>

Sent: Monday, March 24, 2025 12:21 PM

To: [REDACTED]  
[REDACTED]  
[REDACTED]

Cc: [REDACTED]  
[REDACTED]

Subject: RE: FOR REVIEW: Presidential Exemption - Notification List

[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Monday, March 24, 2025 12:20 PM

To: [REDACTED]  
[REDACTED]

Cc: [REDACTED]  
<[REDACTED]>

Subject: RE: FOR REVIEW: Presidential Exemption - Notification List

+ SPPD Comms Team

[REDACTED]  
Group Leader - Energy Strategies Group  
U.S. EPA - Office of Air Quality Planning and Standards  
Research Triangle Park, NC  
Email: [REDACTED]  
[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Monday, March 24, 2025 12:15 PM

To: [REDACTED]

**Subject:** FOR REVIEW: Presidential Exemption - Notification List

**Importance:** High

Hi Everyone,

At 3:00 today we are planning to announce the ability for industry to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act for nine of our air toxics rules:

- MATS
- HON
- EtO Sterilizers
- Rubber Tire Manufacturing
- Primary Copper Smelting
- Integrated Iron & Steel
- Lime Manufacturing
- Coke Ovens
- Taconite

I've assembled a notification list that I pulled from our communication plans for each rule announcement.

**Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

Could you have your folks take a look at these and have them (1) add any additional industry contacts, and (2) ensure the list is up to date? The deadline is **ASAP**. My apologies for the short turnaround.

Thanks so much, and please let me know if you have any questions.



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams  
Mobile: 919.321.7652  
Desk Phone: 919.541.9424  
Email: [REDACTED]@epa.gov

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 7:21:22 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** Changing a few words

... may submit a request for a Presidential Exemption to this email address ~~using this link:~~ [mirazhang@epa.gov](mailto:mirazhang@epa.gov)

Could you make these edits?

Thanks,

[REDACTED]

\*\*\*\*\*

[REDACTED]

Director  
Policy Analysis and Communications  
EPA's Office of Air Quality Planning and Standards

[REDACTED]

Call me on Teams

[REDACTED]@epa.gov

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 7:09:15 PM  
**To:** [REDACTED]@epa.gov]  
**CC:** [REDACTED]  
**Subject:** RE: Process for submitting a request for a Presidential Exemption -- email airaction@epa.gov

Thanks [REDACTED]

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:57 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]  
**Subject:** Process for submitting a request for a Presidential Exemption -- email airaction@epa.gov

Hi [REDACTED] --

Wanted to give you the info about a small action that is being announced at 3pm today. EPA is letting folks know that they can submit a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4) by emailing it to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The attached communication strategy provides the list of NESHAPS and a desk statement. There are a few QAs that we're still working on.

<https://www.epa.gov/stationary-sources-air-pollution> -- link to page with more info will be live from the banner at 3pm

Thanks,  
[REDACTED]

## Appointment

---

**From:** [REDACTED] [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=85f0f472928e4767965c94e609fedc45-McLamb, Marguerite]  
**Sent:** 3/18/2025 2:53:14 PM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**CC:** [REDACTED]

**Subject:** EtO Sterilizers - immediate questions re path forward  
**Location:** Microsoft Teams Meeting

**Start:** 3/18/2025 4:00:00 PM  
**End:** 3/18/2025 5:00:00 PM  
**Show Time As:** Busy

**Importance:** High

**Required Attendees:** [REDACTED]  
**Optional Attendees:** [REDACTED]

Hi all,

Before the briefing with [REDACTED] tomorrow, we need to cover a number of questions about possible scenarios and adjust the briefing plan and materials accordingly as best possible. Here are questions raised by [REDACTED] this morning:

1) Presidential exemption:

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2)

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## Ex. 5 Deliberative Process (DP)

3)

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**Microsoft Teams** [Need help?](#)

**Ex. 6 Personal Privacy (PP)**

Meeting ID: **Ex. 6 Personal Privacy (PP)**  
Passcode: **Ex. 6 Personal Privacy (PP)**

### Dial in by phone

**Ex. 6 Personal Privacy (PP)** United States, Raleigh  
Phone conference ID: **Ex. 6 Personal Privacy (PP)**

### Join on a video conferencing device

Tenant key: [slo teams/join/video.epa.gov](https://slo teams/join/video.epa.gov)

Video ID: **Ex. 6 Personal Privacy (PP)**

[More info](#)

For organizers: **Ex. 6 Personal Privacy (PP)**

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

---



## Appointment

---

**From:** [REDACTED] [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=85f0f472928e4767965c94e609fedc45-[REDACTED]]

**Sent:** 3/18/2025 2:53:17 PM

**To:** [REDACTED]  
[REDACTED]

**Subject:** EtO Sterilizers - immediate questions re path forward

**Location:** Microsoft Teams Meeting

**Start:** 3/18/2025 4:00:00 PM

**End:** 3/18/2025 5:00:00 PM

**Show Time As:** Tentative

**Importance:** High

**Required Attendees:** [REDACTED]

Hi all,

Before the briefing with [REDACTED] tomorrow, we need to cover a number of questions about possible scenarios and adjust the briefing plan and materials accordingly as best possible. Here are questions raised by [REDACTED] this morning:

1) Presidential exemption:

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- 

2) **Ex. 5 Deliberative Process (DP)**

- 
- 

3)

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- 

---

## Microsoft Teams Need help?

**Ex. 6 Personal Privacy (PP)**

Meeting ID: [REDACTED]  
Passcode: [REDACTED]

## Dial in by phone

**Ex. 6 Personal Privacy (PP)**

United States, Raleigh

Phone conference ID:

**Ex. 6 Personal Privacy (PP)**

## Join on a video conferencing device

Tenant key: sip:teams@video.epa.gov

Video ID:

**Ex. 6 Personal Privacy (PP)**

[More info](#)

For organizers:

**Ex. 6 Personal Privacy (PP)**

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

---

## Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=85F0F472928E4767965C94E609FEDC45-[REDACTED]]  
**Sent:** 3/18/2025 2:54:59 PM  
**To:** [REDACTED]  
**Subject:** RE: EtO Sterilizers - immediate questions re path forward

Hi all,

I just sent this meeting invitation, and I apologize for the last-minute notice. Here is the goal of the discussion:

Before the briefing with [REDACTED] tomorrow, we need to cover a number of questions about possible scenarios and adjust the briefing plan and materials accordingly as best possible. Here are questions raised by [REDACTED] this morning:

1) Presidential exemption:

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- 

2)

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- 

## Ex. 5 Deliberative Process (DP)

3)

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## Microsoft Teams [Need help?](#)

### Ex. 6 Personal Privacy (PP)

Meeting ID: [REDACTED]  
Passcode: [REDACTED]

### Dial in by phone

Ex. 6 Personal Privacy (PP) United States, Raleigh

Phone conference ID: [REDACTED]

## Join on a video conferencing device

Tenant key: sip:tenant1@video.epa.gov

Video ID: **Ex. 6 Personal Privacy (PP)**

[More info](#)

For organizers **Ex. 6 Personal Privacy (PP)**

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

---

## Appointment

---

**From:** [REDACTED] [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=85f0f472928e4767965c94e609fedc45-[REDACTED]]  
**Sent:** 3/18/2025 3:56:35 PM  
**CC:** [REDACTED]@epa.gov]

**Subject:** EtO Sterilizers - immediate questions re path forward  
**Location:** Microsoft Teams Meeting

**Start:** 3/18/2025 4:00:00 PM  
**End:** 3/18/2025 5:00:00 PM  
**Show Time As:** Tentative

**Importance:** High

**Required Attendees:** [REDACTED]  
**Optional Attendees:** [REDACTED]

Hi all,

Before the briefing with [REDACTED] tomorrow, we need to cover a number of questions about possible scenarios and adjust the briefing plan and materials accordingly as best possible. Here are questions raised by Penny this morning:

1) Presidential exemption:

- 
- 
- 
- 

2)

- 
- 
- 

## Ex. 5 Deliberative Process (DP)

3)

- 
- 

---

## Microsoft Teams [Need help?](#)

### Ex. 6 Personal Privacy (PP)

Meeting ID: [REDACTED]  
Passcode: [REDACTED] Ex. 6 Personal Privacy (PP)

## Dial in by phone

Ex. 6 Personal Privacy (PP)

United States, Raleigh

Phone conference ID:

Ex. 6 Personal Privacy (PP)

## Join on a video conferencing device

Tenant key: [slo teams:54 video.epa.gov](https://slo teams:54 video.epa.gov)

Video ID:

Ex. 6 Personal Privacy (PP)

[More info](#)

For organizer:

Ex. 6 Personal Privacy (PP)

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

---

Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=85F0F472928E4767965C94E609FEDC45-[REDACTED]]  
**Sent:** 3/24/2025 3:50:16 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** FW: 112 Presidential Exemption Info - so far  
**Attachments:** 112 Presidential Exemptions -- announcing process -- Com Strategy.docx; 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Looks like [REDACTED] is helping in a general way with the effort? Since he's in MMG, I thought you should be included in that email. (Plus, Rubber Tire is on the list, once those stakeholder lists are circulated.)

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 11:47 AM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] AirAction <AirAction@epa.gov>  
**Subject:** RE: 112 Presidential Exemption Info - so far

Adding [REDACTED], who is Acting GL.

**From:** Noonan, Jenny <Noonan.Jenny@epa.gov>  
**Sent:** Monday, March 24, 2025 11:40 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** 112 Presidential Exemption Info - so far

Hi [REDACTED]

Thanks for starting to think about the process for collecting requests for a Presidential Exemption from nine NESHAPS (identified below) using CAA section 112(i)(4). As [REDACTED] knows, we have said publicly that we would accept these requests through 3/31/25.

- National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review" (89 FR 38508; May 7, 2024) (MATS Rule)
- "New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins" (89 FR 42932; May 16, 2024) (HON rule);
- "National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review" (89 FR 24090; April 5, 2024) (Sterilizer Rule);
- "National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing" (89 FR 94886; November 29, 2024) (Rubber Tire Rule);

- “National Emission Standards for Hazardous Air Pollutants: Primary Copper Smelting Residual Risk and Technology Review and Primary Copper Smelting Area Source Technology Review” (89 FR 41648; May 13, 2024) (Copper Rule);
- “National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review” (89 FR 23294; April 3, 2024) (Iron and Steel Rule);
- “National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Technology Review” (89 FR 57738; July 16, 2024) (Lime Rule);
- “National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries: Residual Risk and Technology Review, and Periodic Technology Review” (89 FR 55684; July 5, 2024) (Coke Ovens Rule); and
- “National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing” (89 FR 16408; March 6, 2024) (Taconite Rule).

Today at 3pm, we are planning to post a website with more information about the process. In sum, people will be able to submit applications via [act/actonly.sppd.gov](https://www.epa.gov/act/actonly.sppd.gov). I am copying the SPPD communications team because they are likely to have a role in the downstream processing of these requests.

Attached are a static copies of the web text and the draft communication strategy. Both documents are being shared with OAR leadership this morning. Aaron has already weighed in, as has OGC.

PACS will take the lead in sorting out the process for what happens once applications arrive in [act/actonly.sppd.gov](https://www.epa.gov/act/actonly.sppd.gov) —

#### Ex. 5 Deliberative Process (DP)

[REDACTED] and I will be the PACS duo for this effort but I'm copying a few others as an FYI.

Please let me know if you have questions or ideas or concerns.

Thanks,

From: [REDACTED] <[REDACTED]@epa.gov>  
 Sent: Thursday, March 20, 2025 12:06 PM  
 To: [REDACTED] <[REDACTED]@epa.gov>  
 Subject: RE: Question from SPPD

For a future conversation, leading questions from [REDACTED]

“Main questions I have at this point are:

## 1. Ex. 5 Deliberative Process (DP)

My understanding is they have until 3/31 to ask to turn around period will be quite quick”

From: [REDACTED] <[REDACTED]@epa.gov>  
 Sent: Thursday, March 20, 2025 10:37 AM  
 To: [REDACTED] <[REDACTED]@epa.gov>  
 Subject: Question from SPPD

Hi [REDACTED]

[REDACTED] just asked me who in PACS will be working on presidential exemptions for SPPD rules. Any insights on this?

Thanks,





Environmental Protection Specialist  
U.S. EPA, Office of Air Quality Planning and Standards  
Policy Analysis & Communications



Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=85F0F472928E4767965C94E609FEDC45-[REDACTED]]  
**Sent:** 3/24/2025 8:25:55 PM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Subject:** FW: 112 Presidential Exemption Info - so far

**From:** [REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 4:21 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

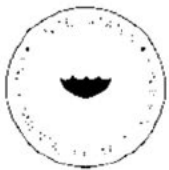
AirAction <AirAction@epa.gov>

**Subject:** RE: 112 Presidential Exemption Info - so far

We did. You can find the information here:

<https://www.epa.gov/stationary-sources-air-pollution>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Email: [REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 4:20 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: 112 Presidential Exemption Info - so far

AirAction <AirAction@epa.gov>

**Subject:** RE: 112 Presidential Exemption Info - so far

Did we post anything yet?

**From:** [REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 11:40 AM

**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov

Cc:

AirAction <AirAction@epa.gov>

**Subject:** 112 Presidential Exemption Info - so far

Hi

Thanks for starting to think about the process for collecting requests for a Presidential Exemption from nine NESHAPS (identified below) using CAA section 112(i)(4). As [REDACTED] knows, we have said publicly that we would accept these requests through 3/31/25.

- National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Residual Risk and Technology Review” (89 FR 38508; May 7, 2024) (MATS Rule)
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- “National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries: Residual Risk and Technology Review, and Periodic Technology Review” (89 FR 55684; July 5, 2024) (Coke Ovens Rule); and
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~~PACS will take the lead in sorting out the process for what happens once applications arrive in air.action2epa.gov.~~

#### **Ex. 5 Deliberative Process (DP)**

[REDACTED] and I will be the PACS duo for this effort but I'm copying a few others as an FYI.

Please let me know if you have questions or ideas or concerns.

Thanks,

**From:** [REDACTED] <[REDACTED]@epa.gov>

**Sent:** Thursday, March 20, 2025 12:06 PM

**To:** [REDACTED] <[REDACTED]@epa.gov>

**Subject:** RE: Question from SPPD

For a future conversation, leading questions from [REDACTED]:

"Main questions I have at this point are:

- 1.
- 2.
- 3.

## Ex. 5 Deliberative Process (DP)

My understanding is they have until 3/31 to ask to turn around period will be quite quick"

**From:** [REDACTED] <[REDACTED]@epa.gov>

**Sent:** Thursday, March 20, 2025 10:37 AM

**To:** [REDACTED] <[REDACTED]@epa.gov>

**Subject:** Question from SPPD

Hi [REDACTED],

[REDACTED] just asked me who in PACS will be working on presidential exemptions for SPPD rules. Any insights on this?

Thanks,

[REDACTED]  
Environmental Protection Specialist  
U.S. EPA, Office of Air Quality Planning and Standards  
Policy Analysis & Communications  
[REDACTED]

Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=85F0F472928E4767965C94E609FEDC45-[REDACTED]]  
**Sent:** 3/25/2025 2:46:11 PM  
**To:** [REDACTED]@epa.gov  
**Subject:** RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Nothing is straightforward, right?

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:43 AM  
**To:** [REDACTED]  
**Subject:** RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Just waiting on

Ex. 5 Deliberative Process (DP)

**Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

Will hopefully get more info soon

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 10:40 AM  
**To:** [REDACTED]  
**Subject:** RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Aha! You and [REDACTED] are already on it! I'll watch the IO Review folder for it to reappear. Thanks to you both.

**From:** [REDACTED]  
**Sent:** Tuesday, March 25, 2025 10:38 AM  
**To:** [REDACTED]  
**Subject:** RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Thanks for looking, [REDACTED]. I haven't found any formal correspondence in my files, either. I'm sure it's come up before, and perhaps the project lead or GL communicated directly via email informally. I'll revisit the letter and add some language on the topic.

Best,

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 7:44 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Hi [REDACTED],

I've looked through Quill and the Comms Sharepoint and haven't been able to find anything.



Environmental Protection Specialist (**SPPD Communications**)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – RCG

Phone : [REDACTED]  
Mobile : [REDACTED]  
Email: [REDACTED]@epa.gov

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[About the Office of Air Quality Planning and Standards \(OAQPS\) - US EPA](#)

**From:** [REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 5:00 PM

**To:** [REDACTED]

**Cc:** [REDACTED]@epa.gov>

**Subject:** RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Is there a good example letter we've done recently where pointed someone back to the state or region if they were requesting an extension under 112(i)(3)(B)/63.6(i)?

[REDACTED]

**From:** [REDACTED] <[REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 3:24 PM

**To:** [REDACTED]

**Cc:** [REDACTED] <[REDACTED]@epa.gov>

**Subject:** FW: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Hi all,

Looks like [REDACTED] is OOO until April 7 (and she was originally working on this response), so I was wondering if we could all work together to make the edits that [REDACTED] suggested.

Attaching the link again here: [W:\20250320\\_Quill\\_Case\\_25-02821-AO-EX\\_Response\\_Ltr\\_to\\_DTE\\_Compliance\\_Date\\_Ext\\_Rqst.docx](#)

Let me know how I can help!

Kind regards,



Environmental Protection Specialist (**SPPD Communications**)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – RCG

Phone : [REDACTED]  
Mobile : [REDACTED]  
Email: [REDACTED]@epa.gov

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[About the Office of Air Quality Planning and Standards \(OAQPS\) - US EPA](#)



From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Monday, March 24, 2025 3:04 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Thanks so much, [REDACTED] – also looping in [REDACTED] and [REDACTED].



[REDACTED]  
Environmental Protection Specialist (*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS SPPD PSG

Phone : [REDACTED]  
Mobile [REDACTED]  
Email: [REDACTED]@epa.gov

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Monday, March 24, 2025 2:59 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

I think the letter that came to me needs to be edited. Mr. Sanch is requesting one additional year pursuant to Clean Air Act (CAA) § 112(i)(3)(B) and 40 C.F.R. § 63.6(i). Because those are site-specific requests, they should be made to the delegated permitting authority, usually the state or if the state hasn't taken delegation, the EPA Regional office. [FYI]

#### Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

#### Ex. 5 Deliberative Process (DP)

But that is not the only way they can seek an exemption. The Administrator's Great American Comeback announcement stated that sources could seek a 2-year compliance waiver under the Presidential Exemption. I just got info a few minute ago from PACS on the name of the EPA mailbox set up to receive these requests. We need to also include this information in the letter. And then finally, as the letter currently states, the Administrator also announced that EPA intends to reconsider the rule.

[REDACTED]  
Director,  
Sector Policies and Programs Division  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
Mail Code: [REDACTED]  
Research Triangle Park, NC 27711

[REDACTED]@epa.gov

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 1:14 PM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: FW: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Please sign and return.

Thank you!

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 8:42 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: FW: Coke Ovens Quill Response for Penny's Signature (case # 25-02821-AO-EX)

Hi [REDACTED]

Please see the attached letter for [REDACTED]'s signature regarding an extension of the compliance date for the Coke Ovens NESHAPs.

Kind regards,



[REDACTED]  
Environmental Protection Specialist (**SPPD Communications**)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – RCG  
  
Phone : [REDACTED]  
Mobile : [REDACTED]  
Email: [REDACTED]@epa.gov  
  
About the Sector Policies and Programs Division (SPPD) – US EPA  
About the Office of Air Quality Planning and Standards (OAQPS) – US EPA

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 8:20 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Updated attached



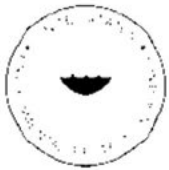
[REDACTED]  
Physical Scientist  
(**SPPD Communications**)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – FIG  
  
Phone : [REDACTED]  
Mobile : [REDACTED]  
Email: [REDACTED]@epa.gov  
  
About the Sector Policies and Programs Division (SPPD) – US EPA



From: [REDACTED]  
Sent: Monday, March 24, 2025 8:08 AM  
To: [REDACTED] <[REDACTED]@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>  
Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

See attached. The spacing was weird, so I had to move [REDACTED]'s signature block to the second page.

Also please ensure that all sides of the margins on these docs are 0.75"



[REDACTED]  
Physical Scientist  
(*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – FIG

Phone : [REDACTED]  
Mobile : [REDACTED]  
Email: [REDACTED] <[REDACTED]@epa.gov>

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[About the Office of Air Quality Planning and Standards \(OAQPS\) | U.S. EPA](#)

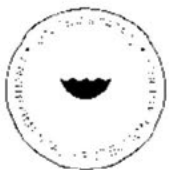
From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 7:40 AM  
To: [REDACTED] <[REDACTED]@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>  
Subject: FW: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Hey [REDACTED]! I am so sorry to ask, but I don't yet have Adobe Pro completely set up – would you happen to have this time this morning to add letterhead and the signature block to this?

No rush, but thank you so much if you are able to do so!

Looping [REDACTED] in since this is Coke Ovens.

Thanks!



[REDACTED]  
Environmental Protection Specialist (*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – PSG

Phone : [REDACTED]  
Mobile : [REDACTED]  
Email: [REDACTED] <[REDACTED]@epa.gov>

**From:** [REDACTED]  
**Sent:** Friday, March 21, 2025 1:18 PM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED]

**Subject:** Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

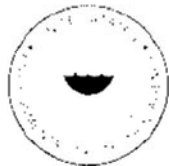
Good afternoon, Miss [REDACTED]!

Attached above is a letter for [REDACTED]'s signature on Coke Ovens. It's been approved by SPPD IO.

(Quill case # 25-02821-AO-EX requesting compliance date extension for Coke Ovens)

Thanks so much, and please let us know if anything else is needed!

Wishing you the best,



[REDACTED]  
Environmental Protection Specialist (*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – PSG

**Phone :** [REDACTED]  
**Mobile :** [REDACTED]  
**Email:** [REDACTED]@epa.gov

Message

From: [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=85F0F472928E4767965C94E609FEDC45-[REDACTED]]  
Sent: 3/25/2025 2:46:20 PM  
To: [REDACTED]  
Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Thanks for the update!

From: [REDACTED]@epa.gov>  
Sent: Tuesday, March 25, 2025 10:43 AM  
To: [REDACTED]

Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Just waiting on [REDACTED]

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Will hopefully get more info soon

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Subject: RE: Coke Ovens Quill Response for Penny's Signature (case # 25-02821-AO-EX)

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Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

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To: [REDACTED]

Cc: [REDACTED]  
Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

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Environmental Protection Specialist (**SPPD Communications**)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – RCG

Phone : [REDACTED]  
Mobile : [REDACTED]  
Email : [REDACTED]@epa.gov

[About the Sector Policies and Programs Division \(SPPD\) - US EPA](#)

[About the Office of Air Quality Planning and Standards \(OAQPS\) - US EPA](#)

**From:** [REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 5:00 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Is there a good example letter we've done recently where pointed someone back to the state or region if they were requesting an extension under 112(i)(3)(B)/63.6(i)?

[REDACTED]

**From:** [REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 3:24 PM

**To:** [REDACTED]

**Cc:** [REDACTED]@epa.gov>

**Subject:** FW: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Hi all,

Looks like [REDACTED] is OOO until April 7 (and she was originally working on this response), so I was wondering if we could all work together to make the edits that [REDACTED] suggested.

Attaching the link again here: [W:\20250320\\_Quill\\_Case\\_25-02821-AO-EX\\_Response\\_Ltr\\_to\\_DTE\\_Compliance\\_Date\\_Ext\\_Rqst.docx](#)

Let me know how I can help!

Kind regards,



Environmental Protection Specialist (**SPPD Communications**)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – RCG

Phone : [REDACTED]  
Mobile : [REDACTED]  
Email : [REDACTED]@epa.gov

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[About the Office of Air Quality Planning and Standards \(OAQPS\) - US EPA](#)

From: [REDACTED]@epa.gov>

Sent: Monday, March 24, 2025 3:04 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Thanks so much, [REDACTED] – also looping in [REDACTED] and [REDACTED].



[REDACTED]  
Environmental Protection Specialist (*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS SPPD PSG

Phone [REDACTED]

Mobile [REDACTED]

Email: [REDACTED]

From: [REDACTED]@epa.gov>

Sent: Monday, March 24, 2025 2:59 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

I think the letter that came to me needs to be edited. Mr. Sanch is requesting one additional year pursuant to Clean Air Act (CAA) § 112(i)(3)(B) and 40 C.F.R. § 63.6(i). Because those are site-specific requests, they should be made to the delegated permitting authority, usually the state or if the state hasn't taken delegation, the EPA Regional office. [FYI - **Ex. 5 Deliberative Process (DP)**]

## **Ex. 5 Deliberative Process (DP)**

### **Ex. 5 Deliberative Process (DP)**

But that is not the only way they can seek an exemption. The Administrator's Great American Comeback announcement stated that sources could seek a 2-year compliance waiver under the Presidential Exemption. I just got info a few minute ago from PACS on the name of the EPA mailbox set up to receive these requests. We need to also include this information in the letter. And then finally, as the letter currently states, the Administrator also announced that EPA intends to reconsider the rule.

Director,

Sector Policies and Programs Division

Office of Air Quality Planning and Standards

U.S. Environmental Protection Agency

Mail Code: [REDACTED]

Research Triangle Park, NC 27711

[REDACTED]@epa.gov



From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 1:14 PM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: FW: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Please sign and return.

Thank you!

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 8:42 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: FW: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Hi [REDACTED]

Please see the attached letter for [REDACTED]'s signature regarding an extension of the compliance date for the Coke Ovens NESHAPs.

Kind regards,



[REDACTED]  
Environmental Protection Specialist (*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – RCG

Phone: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]

About the Sector Policies and Programs Division (SPPD) – U.S. EPA

About the Office of Air Quality Planning and Standards (OAQPS) – U.S. EPA

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 8:20 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: RE: Coke Ovens Quill Response for Penny's Signature (case # 25-02821-AO-EX)

Updated attached



[REDACTED]  
Physical Scientist  
(*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – FIG

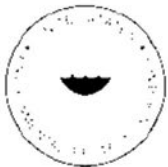
Phone: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]

About the Sector Policies and Programs Division (SPPD) – U.S. EPA

From: [REDACTED]  
Sent: Monday, March 24, 2025 8:08 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: RE: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

See attached. The spacing was weird, so I had to move [REDACTED]'s signature block to the second page.

Also please ensure that all sides of the margins on these docs are 0.75"



[REDACTED]  
Physical Scientist  
(*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – FIG

Phone: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]

[About the Sector Policy and Programs Division \(SPPD\) | US EPA](#)

[About the Office of Air Quality Planning and Standards \(OAQPS\) | US EPA](#)

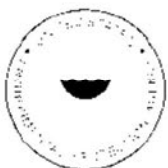
From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 7:40 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: FW: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

Hey [REDACTED]! I am so sorry to ask, but I don't yet have Adobe Pro completely set up – would you happen to have this time this morning to add letterhead and the signature block to this?

No rush, but thank you so much if you are able to do so!

Looping [REDACTED] in since this is Coke Ovens.

Thanks!



[REDACTED]  
Environmental Protection Specialist (*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – PSG

Phone: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]

From: [REDACTED]

Sent: Friday, March 21, 2025 1:18 PM

To: [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED]

Subject: Coke Ovens Quill Response for [REDACTED]'s Signature (case # 25-02821-AO-EX)

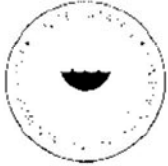
Good afternoon, Miss [REDACTED]

Attached above is a letter for [REDACTED]'s signature on Coke Ovens. It's been approved by SPPD IO.

(Quill case # 25-02821-AO-EX requesting compliance date extension for Coke Ovens)

Thanks so much, and please let us know if anything else is needed!

Wishing you the best,



[REDACTED]  
Environmental Protection Specialist (*SPPD Communications*)  
U.S. EPA Office of Air and Radiation OAQPS – SPPD – PSG

Phone : [REDACTED]  
Mobile : [REDACTED]  
Email : [REDACTED]



Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/19/2025 5:22:20 PM  
**To:** [REDACTED]  
**CC:** [REDACTED]  
**Subject:** RE: Sterilizers briefing  
**Attachments:** EtO Reconsideration Letter for Signature 3.18.2025.docx

And I'll be using the version that [REDACTED] sent around yesterday (clean version attached).  
[REDACTED]

**From:** [REDACTED]@epa.gov>  
**Sent:** Wednesday, March 19, 2025 1:18 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Sterilizers briefing

Thanks, [REDACTED]. We will start routing the letter through Quill.

**From:** [REDACTED]@epa.gov>  
**Sent:** Wednesday, March 19, 2025 1:06 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Sterilizers briefing

I believe the current letter adequately signals that we may be rethinking our authority to undertake a risk review. I don't believe Aaron has seen the letter but was reacting to a question from me about how clear to be in the reconsideration letter about this new direction.

[REDACTED]  
[REDACTED]  
**From:** [REDACTED]@epa.gov>  
**Sent:** Wednesday, March 19, 2025 12:25 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Sterilizers briefing

Thanks for the report-out and update, [REDACTED].

[REDACTED] and [REDACTED], please let us know about edits to the letter responsive to Aaron's question; once that is settled, we can finalize the letter and put it into the correspondence system (Quill) for OAR signature.

Best,  
[REDACTED]

From: [REDACTED]@epa.gov>  
Sent: Wednesday, March 19, 2025 12:12 PM  
To: [REDACTED]  
<[REDACTED]>  
Cc: [REDACTED]  
Subject: Sterilizers briefing

Hi all,

## Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) ?

Some other items of interest:

- Ex. 5 Deliberative Process (DP)
- Presidential exemption:

## Ex. 5 Deliberative Process (DP)

Lea, please let me know if I got anything wrong.

Thank you,

[REDACTED] PE

Message

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From: [REDACTED]@epa.gov]  
Sent: 3/14/2025 1:15:00 PM  
To: [REDACTED]  
[REDACTED]  
CC: [REDACTED]  
[REDACTED]  
Subject: RE: MATS Repeal

I'm not sure we will need to mention the 112(i)(4) provision ... see below from the MATS fact sheet prepared for the "Deregulatory Actions" press release.

Fact Sheet - Reconsideration of Mercury and Air Toxics Standards

- Clean Air Act Section 112(i)(4) states the President of the United States may grant up to a 2-year exemption from compliance obligations for any source if the President finds that "the technology to implement such standard is not available and that is in the national security interests of the United States to do so."
- Any source interested in a Presidential exemption, should provide their recommendations to EPA **by March 31, 2025**.
- Sources need only provide why technology is unavailable and why it is in the national security interests of the United States to provide the exemption.

[REDACTED], PhD  
Group Leader - Energy Strategies Group  
U.S. EPA - Office of Air Quality Planning and Standards  
Research Triangle Park, NC  
Email: [REDACTED]@epa.gov  
Tel: [REDACTED]  
Mobile: [REDACTED]  
About the Science Policies and Programs Division (SPPD) - U.S. EPA

From: [REDACTED]  
Sent: Thursday, March 13, 2025 1:12 PM  
To: [REDACTED]  
[REDACTED]  
Cc: [REDACTED]

Subject: RE: MATS Repeal

## Ex. 5 Deliberative Process (DP)

[REDACTED], PhD  
Group Leader - Energy Strategies Group  
U.S. EPA - Office of Air Quality Planning and Standards  
Research Triangle Park, NC  
Email: [REDACTED]  
Tel: [REDACTED]  
Mobile: [REDACTED]  
About the Senior Policies and Programs Division - SPPD - U.S. EPA

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Thursday, March 13, 2025 1:09 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: MATS Repeal

The "Reasons for Action" FYI: <https://www.epa.gov/system/files/documents/2025/03/fact-sheet-reconsideration-of-mercury-and-air-toxics-standards.pdf>

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Thursday, March 13, 2025 10:55 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: MATS Repeal

[REDACTED] and I spoke with [REDACTED] about the [REDACTED] this morning.

## Ex. 5 Deliberative Process (DP)

But she intends to run that by [REDACTED] to see what he thinks. So, I think we should, at least initially, start to think through [REDACTED]

[REDACTED]

[REDACTED], PhD  
Group Leader - Energy Strategies Group  
U.S. EPA - Office of Air Quality Planning and Standards  
Research Triangle Park, NC  
Email: [REDACTED]

Tel: [REDACTED]

Mobile: [REDACTED]

Align the System Policies and Programs Database (SPD) - US EPA

Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=85F0F472928E4767965C94E609FEDC45-[REDACTED]]  
**Sent:** 3/21/2025 3:53:21 PM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Subject:** RE: Directions for Presidential Exemption Submissions  
**Attachments:** Sterilizers 112(i)(4) memo.pdf

## Ex. 5 Deliberative Process (DP)

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 11:09 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Directions for Presidential Exemption Submissions

Heres a link for your review! I was envisioning language for use in an email and on a webpage. If anyone has any more specifics about what should be submitted, that would be awesome 🙌

Including all but [REDACTED] on this draft.

[Presidential Exemption Directions .docx](#)

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/21/2025 6:24:13 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** FW: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx  
**Attachments:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

FYI

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 2:15 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>  
**Subject:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Please see Aaron's edits attached. We need to share with OGC for their review/input.

Ex. 5 Deliberative Process (DP)

He would also like to have this posted on Monday. Let me know if that's possible.

Message

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**From:** [REDACTED]@epa.gov]

**Sent:** 3/24/2025 7:33:23 PM

**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>



Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 1:22:18 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]  
**Subject:** FW: Section 112 Presidential Exemption -- text and communication plan  
**Attachments:** 2025.03.21\_Presidential Exemption Directions\_Edits.docx

Good morning

Any edits or concerns about the attached documents?

In addition, do you know of any fact sheet or other document that was released on 3/12 that outlines a process or provides more details about dates related to the Presidential Exemptions under section 112? We would like to have such info and link to it if it is already on the web.


The [anaction@epa.gov](mailto:anaction@epa.gov) email box exists now and we'll be working on a process to funnel anything we receive to the appropriate staff and records management systems.

Thanks,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, March 21, 2025 4:27 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** Presidential Exemption -- text and communication plan

Hi [REDACTED] -

Here are some materials for a Monday afternoon announcement of the email box.

Communication strategy:  112 Presidential Exemptions -- announcing process -- Com Strategy.docx  
Web text/email: Attached as a static file

We recommend posting the announcement here. We're working on a new banner that will link to a new page.

<https://www.epa.gov/stationary-sources-air-pollution>

On Monday, we can also put a link on each of the nine NESHAP pages from the March 12<sup>th</sup> announcement.

Have a great weekend!

Thanks,  
[REDACTED]

\*\*\*\*\*  
[REDACTED]

Director  
Policy Analysis and Communications

EPA's Office of Air Quality Planning and Standards



Call me on Teams

[\[redacted\]@epa.gov](#)

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 1:16:05 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]  
**Subject:** RE: Iron and Steel administrative stay -- signed

+ [REDACTED] FYSA on the OPEEE team.

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 9:13 AM  
**To:** [REDACTED]@epa.gov>; Abboud, Michael <abboud.michael@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: Iron and Steel administrative stay -- signed

You bet, [REDACTED] the prepublication copy will be posted at noon. The program office will be doing notifications (noted in the comms plan, link below). Thanks

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 7:50 AM  
**To:** [REDACTED]@epa.gov>; Abboud, Michael <abboud.michael@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** Re: Iron and Steel administrative stay -- signed

Thanks [REDACTED]

Get Outlook for iOS

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 5:17:33 PM  
**To:** Abboud, Michael <abboud.michael@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** FW: Iron and Steel administrative stay -- signed

Hi Mike and [REDACTED] – we just heard that this action was signed. We're planning to post tomorrow. Tomorrow morning, we'll let you know when it'll get posted after we check in with Aaron, Abbie and Alex on any preferences for timing.

OPA and OCIR are in the loop.

We're here for any questions –

Thanks


[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 5:12 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

[REDACTED]@epa.gov>; [REDACTED]@epa.gov>

**Subject:** Iron and Steel administrative stay -- signed

The iron and steel administrative stay was signed today. We're going to hold off till tomorrow to post online and notify. We'll advise on timing in the morning. Here's the comms plan link and the statement pasted below thanks!

 [Communications Rollout Plan - IIS - Administrative Stay.docx](#)

## Ex. 5 Deliberative Process (DP)

**From:** [REDACTED]@epa.gov>

**Sent:** Monday, March 24, 2025 10:25 AM

**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>

**Subject:** FW: OPA approval: upcoming OAR actions

Please let us know when these are signed and live. Also, send any updated statements when ready. Flagging for OCIR and press awareness.

**Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act:** To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

## Ex. 5 Deliberative Process (DP)

Thanks!

**From:** Vaseliou, Molly <[Vaseliou.Molly@epa.gov](mailto:Vaseliou.Molly@epa.gov)>

**Sent:** Monday, March 24, 2025 9:28 AM

**To:** [REDACTED]@epa.gov>; Mandy, Cora <[Mandy.Cora@epa.gov](mailto:Mandy.Cora@epa.gov)>; [REDACTED]  
[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov>

Subject: RE: OPA approval: upcoming OAR actions

Sorry for the delayed review. **Ex. 5 Deliberative Process (DP)**

From: [REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 6:15 PM

To: Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]

[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]

[REDACTED]@epa.gov>

Subject: OPA approval: upcoming OAR actions

For OPA review. Note the second action, regarding a PR. Please let us know if you have a preferred approach.

From: [REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 6:13 PM

To: [REDACTED]@epa.gov>; AO OPA News Release Coord

<AO\_OPA\_News\_Release\_Coord@epa.gov>

Cc: [REDACTED]@epa.gov>

Subject: Re: upcoming OAR actions

Got it! We'll flag for folks. Thanks for sending!

From: [REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 6:11:28 PM

To: AO OPA News Release Coord <AO\_OPA\_News\_Release\_Coord@epa.gov>

Cc: [REDACTED]@epa.gov>

Subject: upcoming OAR actions

Hi all,

I have two things to flag for next week (the first I just heard about a half hour ago). I'll try to send a two week look-ahead next week, but things are coming up quickly over here!

Thanks,

[REDACTED]

- **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act**

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

*Timing:* Monday 3/24, afternoon

*Comms:* Desk statement, social media message (will send comms plan /desk statement Monday AM)

## **Ex. 5 Deliberative Process (DP)**

Message

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**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C067CAA6C93544F78C26AB08CC567D27-[REDACTED]  
**Sent:** 3/24/2025 5:23:26 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** FW: NESHAP Pres Exemptions

Fyi --

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 11:37 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** NESHAP Pres Exemptions

Hi Aaron, Abbie and Alex -- Comms plan and web text linked below. Just wanted to check if industry, Hill, or intergov notifications are needed before or after the web goes live, or if we should just post this afternoon and leave it at that for today. OPA is plugged in, so we're good there, but if you like, we can flag for OCIR and public engagement (Mike Abboud & team), too, so they're aware.

At 3pm today OAQPS is planning post information in the banner of [this website](#) announcing that facilities can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for the nine NESHAPS identified in the 3-12 press release. The email box is live now and OAQPS staff have access to it.

The communication strategy has the desk statement and a social media post, and we can add a notification list if needed. There are a couple of q/a in the comms plan that will need fleshing out in case we're asked.

Communication Strategy: [\[REDACTED\] 112 Presidential Exemptions -- announcing process -- Com Strategy.docx](#)  
Web text (and text for emails to stakeholders) - [\[REDACTED\] 2025.03.21\\_Presidential Exemption Directions\\_ Egdits.docx](#)

We'll proceed to post at 3pm, unless we hear otherwise.

Thanks --

[REDACTED]  
[REDACTED]  
Communications Director  
Office of Air & Radiation  
U.S. Environmental Protection Agency  
Desk: [REDACTED]  
Cell: [REDACTED]



Message


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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/17/2025 4:14:42 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** FW: AirAction mailbox

From [REDACTED] We could easily have her give others access if needed.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 17, 2025 12:14 PM  
**To:** [REDACTED]@epa.gov>  
**Subject:** RE: AirAction mailbox

We still have maction@epa.gov. It is in my name. [REDACTED] has asked me to keep it open.

Here's where I stashed files on the account on the OAQPS PACS team  [AirAction](#)

(I will note that I turned it over to [REDACTED] in SPPD several years ago. But SPPD is not using it to my knowledge. They have created their own.)



Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/20/2025 4:05:53 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** RE: Question from SPPD

For a future conversation, leading questions from [REDACTED]:

"Main questions I have at this point are:

1. **Ex. 5 Deliberative Process (DP)**
- 2.
- 3.

My understanding is they have until 3/31 to ask to turn around period will be quite quick"

**From:** [REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 11:16 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** RE: Question from SPPD

Of course!

**From:** [REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 11:07 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** RE: Question from SPPD

I don't think I know what that means! Maybe we can chat about it?

**From:** [REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 10:47 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** RE: Question from SPPD

How about you? 😊

**From:** [REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 10:37 AM  
**To:** [REDACTED]@epa.gov>  
**Subject:** Question from SPPD

Hi [REDACTED]

Korbin just asked me who in PACS will be working on presidential exemptions for SPPD rules. Any insights on this?

Thanks,  
[REDACTED]

[REDACTED]  
Environmental Protection Specialist



Message

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 12:25:24 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** RE: 112 Presidential Exemption Info - so far

Thanks for sending this recap, [REDACTED] I'll work on getting the inbox up on my end and can start monitoring.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:40 AM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov;  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; AirAction <AirAction@epa.gov>

**Subject:** 112 Presidential Exemption Info - so far

Hi [REDACTED] and [REDACTED]—

Thanks for starting to think about the process for collecting requests for a Presidential Exemption from nine NESHAPS (identified below) using CAA section 112(i)(4). As [REDACTED] knows, we have said publicly that we would accept these requests through 3/31/25.

- “National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Residual Risk and Technology Review” (89 FR 38508; May 7, 2024) (MATS Rule)
- “New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins” (89 FR 42932; May 16, 2024) (HON rule);
- “National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review” (89 FR 24090; April 5, 2024) (Sterilizer Rule);
- “National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing” (89 FR 94886; November 29, 2024) (Rubber Tire Rule);
- “National Emission Standards for Hazardous Air Pollutants: Primary Copper Smelting Residual Risk and Technology Review and Primary Copper Smelting Area Source Technology Review” (89 FR 41648; May 13, 2024) (Copper Rule);
- “National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review” (89 FR 23294; April 3, 2024) (Iron and Steel Rule);
- “National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Technology Review” (89 FR 57738; July 16, 2024) (Lime Rule);
- “National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries: Residual Risk and Technology Review, and Periodic Technology Review” (89 FR 55684; July 5, 2024) (Coke Ovens Rule); and
- “National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing” (89 FR 16408; March 6, 2024) (Taconite Rule).

Today at 3pm, we are planning to post a website with more information about the process. In sum, people will be able to submit applications via [aaction.org/epa.gov](http://aaction.org/epa.gov). I am copying the SPPD communications team because they are likely to have a role in the downstream processing of these requests.

Attached are a static copies of the web text and the draft communication strategy. Both documents are being shared with OAR leadership this morning. Aaron has already weighed in, as has OGC.

PACS will take the lead in sorting out the process for what happens once applications arrive in [airaction@epa.gov](mailto:airaction@epa.gov)

**Ex. 5 Deliberative Process (DP)**

Lauren and I will be the PACS duo for this effort but I'm copying a few others as an FYI.

Please let me know if you have questions or ideas or concerns.

Thanks,

From: [REDACTED] <[\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)>

Sent: Thursday, March 20, 2025 12:06 PM

To: [REDACTED] <[\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)>

Subject: RE: Question from SPPD

For a future conversation, leading questions from [REDACTED]

"Main questions I have at this point are:

- 1.
- 2.
- 3.

**Ex. 5 Deliberative Process (DP)**

My understanding is they have until 3/31 to ask to turn around period will be quite quick"

From: [REDACTED] <[\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)>

Sent: Thursday, March 20, 2025 10:37 AM

To: [REDACTED] <[\[REDACTED\]@epa.gov](mailto:[REDACTED]@epa.gov)>

Subject: Question from SPPD

Hi [REDACTED]

[REDACTED] just asked me who in PACS will be working on presidential exemptions for SPPD rules. Any insights on this?

Thanks,

[REDACTED]  
Environmental Protection Specialist  
U.S. EPA, Office of Air Quality Planning and Standards  
Policy Analysis & Communications  
[REDACTED]

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 3:36:09 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** AirAction Inbox  
**Attachments:** User Guide Shared Mailboxes.docx

Hi [REDACTED]

I'm having trouble accessing the AirAction inbox. I've tried via SharePoint and my desktop Outlook app. I'm going to open a ticket to see if I can gain access since [REDACTED] made me an inbox owner.

In case people are having a hard time figuring out how to add the inbox to Outlook, I've attached a shared mailbox user guide that was sent to me when I was establishing the Flag Program inbox. This info still holds if folks choose to add the inbox in the Outlook desktop app.

[REDACTED]  
[REDACTED]  
Environmental Protection Specialist  
U.S. EPA, Office of Air Quality Planning and Standards  
Policy Analysis & Communications  
[REDACTED]

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19D41FF0E3054AFA47D3C33308E5B30 [REDACTED]]  
**Sent:** 3/21/2025 6:39:24 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Yes!

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 2:38 PM  
**To:** [REDACTED]@epa.gov>  
**Subject:** FW: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Does this accomplish what you wanted sorry, I was in deep on something else.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 2:29 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Link to shared file: [W=1 2025.03.21\\_Presidential Exemption Directions\\_ Edits.docx](#)

Best,

[REDACTED]  
[REDACTED]  
OAR/OAQPS

Office: [REDACTED] cell: [REDACTED]

[REDACTED]@epa.gov

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 2:15 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Please see Aaron's edits attached. We need to share with OGC for their review/input. Ex. 5 Deliberative Process (DP)  
[REDACTED] He would also like to have this posted on Monday. Let me know if that's possible.

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19D41FF0E3054AAFA47D3C33308E5B30-[REDACTED]]  
**Sent:** 3/21/2025 7:41:11 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** [REDACTED] left a comment in "2025.03.21\_Presidential Exemption Directions\_Edits"

-->

-->

**W** 2025.03.21\_Presidential Exemption Directions\_Edits.docx

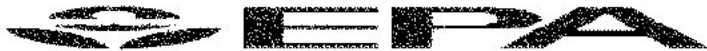


[REDACTED] added a comment

[Go to comment](#)

**Ex. 5 Deliberative Process (DP)**

[Notification Settings](#)



[Privacy Statement](#)

This email is generated through Environmental Protection Agency (EPA)'s use of Microsoft 365 and may contain content that is controlled by Environmental Protection Agency (EPA).



Message

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19D41FF0E3054AAFA47D3C33308E5B30- [REDACTED]]  
**Sent:** 3/24/2025 3:56:08 PM  
**To:** [REDACTED]@epa.gov  
**Subject:** RE: 112 Presidential Exemption Info - so far

Great idea! Thanks

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:54 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: 112 Presidential Exemption Info - so far

Thanks [REDACTED] and [REDACTED]

This provides a lot of clarify. One small recommendation on the com strategy document	Ex. 5 Deliberative Process (DP)
Ex. 5 Deliberative Process (DP)	

dozens of NESHA's. **Ex. 5 Deliberative Process (DP)** 5. There are

Maybe something like

	Ex. 5 Deliberative Process (DP)
Ex. 5 Deliberative Process (DP)	

Not a show stopper just a recommendation. Appreciate all of PACs help with coordinating this.

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:40 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
 [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>;  
 [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
 [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>;  
 [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; AirAction <AirAction@epa.gov>  
**Subject:** 112 Presidential Exemption Info - so far

Hli and

Thanks for starting to think about the process for collecting requests for a Presidential Exemption from nine NESHAPS (identified below) using CAA section 112(i)(4). As Marguerite knows, we have said publicly that we would accept these requests through 3/31/25.

- National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review” (89 FR 38508; May 7, 2024) (MATS Rule)
- “New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins” (89 FR 42932; May 16, 2024) (HON rule);
- “National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review” (89 FR 24090; April 5, 2024) (Sterilizer Rule);
- “National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing” (89 FR 94886; November 29, 2024) (Rubber Tire Rule);



- “National Emission Standards for Hazardous Air Pollutants: Primary Copper Smelting Residual Risk and Technology Review and Primary Copper Smelting Area Source Technology Review” (89 FR 41648; May 13, 2024) (Copper Rule);
- “National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review” (89 FR 23294; April 3, 2024) (Iron and Steel Rule);
- “National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Technology Review” (89 FR 57738; July 16, 2024) (Lime Rule);
- “National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries: Residual Risk and Technology Review, and Periodic Technology Review” (89 FR 55684; July 5, 2024) (Coke Ovens Rule); and
- “National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing” (89 FR 16408; March 6, 2024) (Taconite Rule).

Today at 3pm, we are planning to post a website with more information about the process. In sum, people will be able to submit applications via [efoaction.epa.gov](https://efoaction.epa.gov). I am copying the SPPD communications team because they are likely to have a role in the downstream processing of these requests.

Attached are a static copies of the web text and the draft communication strategy. Both documents are being shared with OAR leadership this morning. Aaron has already weighed in, as has OGC.

PACS will take the lead in sorting out the process for what happens once applications arrive in [efoaction.epa.gov](https://efoaction.epa.gov) –

**Ex. 5 Deliberative Process (DP)**

Lauren and I will be the PACS duo for this effort but I’m copying a few others as an FYI.

Please let me know if you have questions or ideas or concerns.

Thanks,

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 12:06 PM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** RE: Question from SPPD

For a future conversation, leading questions from [REDACTED]

“Main questions I have at this point are:

1. **Ex. 5 Deliberative Process (DP)**  
 2.  
 3.

My understanding is they have until 3/31 to ask to turn around period will be quite quick”

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 10:37 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** Question from SPPD

Hi [REDACTED]

Korbin just asked me who in PACS will be working on presidential exemptions for SPPD rules. Any insights on this?

Thanks,

[REDACTED]

[REDACTED]

Environmental Protection Specialist  
U.S. EPA, Office of Air Quality Planning and Standards  
Policy Analysis & Communications  
[REDACTED]

Message

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19D41FF0E3054AAFA47D3C33308E5B30-[REDACTED]]  
**Sent:** 3/24/2025 7:38:21 PM  
**To:** AirAction [AirAction@epa.gov]  
**Subject:** Presidential Exemption: [INSERT Name of Regulation]: [INSERT Facility(ies) Name]

Test

Thanks,

\*\*\*\*\*  
[REDACTED]

Director  
Policy Analysis and Communications  
EPA's Office of Air Quality Planning and Standards

[REDACTED] (w)  
[REDACTED] (cell)

Call me on Teams

[REDACTED]@epa.gov

Message

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**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19D41FF0E3054AAFA47D3C33308E5B30-[REDACTED]]  
**Sent:** 3/25/2025 8:45:50 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** For your weekly report  
**Attachments:** 112 Presidential Exemptions -- announcing process -- Com Strategy.docx

Hi [REDACTED]

Wanted to share this info that we put up on the web yesterday....

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemptions-information>

it relates to the info at the bottom of this *fact sheet* from 4/12

[https://www.epa.gov/system/files/documents/2025/03/neshap\\_powering\\_the\\_great\\_american\\_comeback\\_fact\\_sheet\\_2.pdf](https://www.epa.gov/system/files/documents/2025/03/neshap_powering_the_great_american_comeback_fact_sheet_2.pdf)

Thanks,

\*\*\*\*\*

[REDACTED]  
Director  
Policy Analysis and Communications  
EPA's Office of Air Quality Planning and Standards  
[REDACTED] (w)  
[REDACTED] (cell)  
Call me on Teams  
[REDACTED]@epa.gov

## **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under Section 112(i)(4) of the Clean Air Act**

### **Desk Statement**

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules listed below, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [ [HYPERLINK "mailto:airaction@epa.gov" \h](mailto:airaction@epa.gov) ].

The Clean Air Act allows the President to exempt stationary sources of air pollution from compliance with any standard or limitation under section 112 for up to two years if the technology to implement the standard is not available and it is in the national security interests of the United States to do so.

An exemption may be extended for up to two additional years and can be renewed, if appropriate.

### **Background**

On March 12, 2025, EPA requested that facilities and/or affected sources subject to the regulations below to submit information about why their facility and/or affected source meets the requirements under Clean Air Act Section 112(i)(4) for a Presidential exemption while EPA reconsiders these rules:

- National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review" (89 FR 38508; May 7, 2024) (MATS Rule)
- "New Source Performance Standards for the Synthetic Organic Chemical Manufacturing Industry and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry and Group I & II Polymers and Resins" (89 FR 42932; May 16, 2024) (HON rule);
- "National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review" (89 FR 24090; April 5, 2024) (Sterilizer Rule);
- "National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing" (89 FR 94886; November 29, 2024) (Rubber Tire Rule);
- "National Emission Standards for Hazardous Air Pollutants: Primary Copper Smelting Residual Risk and Technology Review and Primary Copper Smelting Area Source Technology Review" (89 FR 41648; May 13, 2024) (Copper Rule);

- “National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review” (89 FR 23294; April 3, 2024) (Iron and Steel Rule);
- “National Emission Standards for Hazardous Air Pollutants: Lime Manufacturing Plants Technology Review” (89 FR 57738; July 16, 2024) (Lime Rule);
- “National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries; Residual Risk and Technology Review, and Periodic Technology Review” (89 FR 55684; July 5, 2024) (Coke Ovens Rule); and
- “National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing” (89 FR 16408; March 6, 2024) (Taconite Rule).

## **Social Media**

**EPA AirAccounts (X, FB, Instagram, LinkedIn):** To advance President Trump’s Executive Orders and Power the Great American Comeback, we’ve set up a simple process for the regulated community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. More info [ [HYPERLINK "https://www.epa.gov/stationary-sources-air-pollution" \h](https://www.epa.gov/stationary-sources-air-pollution) ]

## **QA**

**Q: What does the company need to submit to get an exemption?**

**A:**

- Use “Presidential Exemption: [Name of Regulation]: [Facility(ies) Name]” as the subject of the request
- Clearly identify the:
  - Emissions standards or limitations subject to the request,
  - Facility(ies) and/or affected source(s), and
  - Length of compliance period being requested.
- Provide a justification to support the request, including:
  - An explanation why the technology to implement the standard is not available, and
  - An explanation why an extension is in the national security interests of the United States.
- If submitting information on behalf of another facility and/or affected sources that is not under your direct control or ownership, please provide appropriate delegation of authority to submit the request.
- Do not submit proprietary information. If intending to submit proprietary information, please note that if you wish to submit proprietary information and EPA will follow up, as appropriate.

**Q: Does submitting a request entitle the requestor to an exemption?**

A: No, the President still has to make a decision on the merits.

**Web:**

Post on: [ HYPERLINK "<https://www.epa.gov/stationary-sources-air-pollution>" ]

Replace banner box text with this

Title: Powering the Great American Comeback

Text: Request a Presidential Exemption under section 112(i)(4) of the Clean Air Act for certain National Emission Standards for Hazardous Air Pollutants by March 31, 2025.

Create a new website with text from [ HYPERLINK "<https://usepa.sharepoint.com/:w:/s/OAQPS-Management/EQIVsW2H3yxAmQH4Lkadv1gBmoRDxHPIsvj3N-3kmZFRMA?e=vGHcjL>" ]

**Automatic Reply:**

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 the 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.

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/20/2025 2:34:53 PM  
**To:** [REDACTED]@epa.gov]

do you know who in PACS is going to be working with the presidential exemption stuff on our rules?



Message

---

From: [REDACTED]@epa.gov]  
Sent: 3/20/2025 3:53:50 PM  
To: [REDACTED]@epa.gov]

main questions i have at this point are:

- 1.
- 2.
- 3.

## **Ex. 5 Deliberative Process (DP)**

Message

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**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CDA009B6D3AE4CF29D68CC054A97044C-[REDACTED]  
**Sent:** 3/24/2025 7:45:41 PM  
**To:** OARcongressional [OARcongressional@epa.gov]  
**Subject:** FW: Process for submitting a request for a Presidential Exemption -- email airaction@epa.gov  
**Attachments:** 112 Presidential Exemptions -- announcing process -- Com Strategy.docx

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:57 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Process for submitting a request for a Presidential Exemption -- email airaction@epa.gov

Hi [REDACTED] --

Wanted to give you the info about a small action that is being announced at 3pm today. EPA is letting folks know that they can submit a request for an exemption from nine different NESHAPS using Clean Air Act section 112 (i)(4) by emailing it to [airaction@epa.gov](mailto:airaction@epa.gov) by March 31, 2025. The attached communication strategy provides the list of NESHAPS and a desk statement. There are a few QAs that we're still working on.

<https://www.epa.gov/statelocal-sources-air-pollution> -- link to page with more info will be live from the banner at 3pm

Thanks,  
[REDACTED]

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/20/2025 12:23:34 PM  
**To:** OAQPS SPPD NRG [OAQPS\_SPPD\_NRG@epa.gov]; OAQPS SPPD MMG [OAQPS\_SPPD\_MMG@epa.gov]  
**Subject:** Reconsideration of Rules

Hey All,

I am sure most of you saw Administrator Zeldin's announcement of all the reconsideration work that will happen across the Agency under this administration. A fair amount of that will be housed in SPPD and, in fact, there are nine rules that were highlighted for to focus on for the industrial sectors. This fact sheet is a bit buried on some of our websites but thought it is worth highlighting to all of you: [https://www.epa.gov/system/files/documents/2025-03/oe-shap\\_paving\\_the\\_way\\_for\\_industrial\\_great-america-true-comeback\\_fact-sheet\\_2.pdf](https://www.epa.gov/system/files/documents/2025-03/oe-shap_paving_the_way_for_industrial_great-america-true-comeback_fact-sheet_2.pdf)

One aspect to highlight that is buried in the document is the use of a presidential exemption. If you are working on a project that touches on one of the highlighted industries, you are welcome to share with them the information that this waiver is being provided on a *company by company* basis. I believe that PACS will be setting up an inbox to receive those inquiries. Feel free to reach out if you have any questions

[REDACTED]  
Natural Resources Group Leader  
SPPD/OAQPS/OAR  
[SPPD Website](#)

Phone: [REDACTED]

Cell: [REDACTED]

+ > :

Message

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 4:29:55 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** FW: FOR REVIEW: Presidential Exemption - Notification List  
**Importance:** High

Hey All,

Please take a look at the link below's distribution list and see if there is anything to add to the distribution list. Notably they are looking to see if there are any **Ex. 5 Deliberative Process (DP)** should be on there at the very least). Let me know if you have any questions.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 12:15 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** FOR REVIEW: Presidential Exemption - Notification List  
**Importance:** High

Hi Everyone,

At 3:00 today we are planning to announce the ability for industry to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act for nine of our air toxics rules:

- MATS
- HON
- EtO Sterilizers
- Rubber Tire Manufacturing
- Primary Copper Smelting
- Integrated Iron & Steel
- Lime Manufacturing
- Coke Ovens
- Taconite

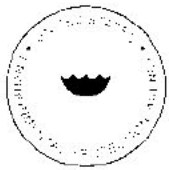
I've assembled a notification list that I pulled from our communication plans for each rule announcement.

[Presidential Exemptions - Notification List.xlsx](#)

## Ex. 5 Deliberative Process (DP)

The deadline is ASAP. My apologies for the short turnaround.

Thanks so much, and please let me know if you have any questions.



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED]@epa.gov

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 5:22:01 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** RE: FOR REVIEW: Presidential Exemption - Notification List

Thank you rockstar

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 1:21 PM  
**To:** [REDACTED]@epa.gov>  
**Subject:** RE: FOR REVIEW: Presidential Exemption - Notification List

[REDACTED] sent them to all of MMG we all should be good

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 1:20 PM  
**To:** [REDACTED]@epa.gov>  
**Subject:** FW: FOR REVIEW: Presidential Exemption - Notification List

Hello hello,

Sorry for the quick ask/turnaround—can you look at the **Ex. 5 Deliberative Process (DP)** **Ex. 5 Deliberative Process (DP)**? I'm going to look at the old comms plan as well, but I'm not sure if the contact info is still correct.

**Ex. 5 Deliberative Process (DP)**

Thank you,

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 12:15 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** FOR REVIEW: Presidential Exemption - Notification List  
**Importance:** High

Hi Everyone,

At 3:00 today we are planning to announce the ability for industry to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act for nine of our air toxics rules:

- MATS
- HON
- EtO Sterilizers
- Rubber Tire Manufacturing
- Primary Copper Smelting
- Integrated Iron & Steel
- Lime Manufacturing
- Coke Ovens

- Taconite

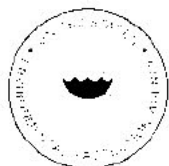
I've assembled a notification list that I pulled from our communication plans for each rule announcement.

 [Presidential Exemptions - Notification List.xlsx](#)

## Ex. 5 Deliberative Process (DP)

The deadline is **ASAP**. My apologies for the short turnaround.

Thanks so much, and please let me know if you have any questions.



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED] @epa.gov

Message

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 11:23:02 AM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]  
**Subject:** RE: PACs' upcoming request concerning Presidential exemption submission stakeholder lists

All,

Here is a link to the working order of receiving the presidential exemption. Let me know if you have any questions

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 11:33 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** FW: PACs' upcoming request concerning Presidential exemption submission stakeholder lists

Hey All,

As stated below, [REDACTED] will be reaching out about distribution lists for our priority rulemakings (Lime, Sterilizers, Coke Ovens, and Rubber Tire) to notify them of the presidential memo process. Just wanted to give you a heads up that this might be coming through soon. Thanks

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:22 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** PACs' upcoming request concerning Presidential exemption submission stakeholder lists

Hi all –

Just a heads-up that this afternoon the agency is announcing the possibility of obtaining a s. 112(i) Presidential exemption for the NESHAPs that were in the March 12 reconsideration announcement and Kristin Filio working on outreach to stakeholders. She is using the outreach lists from the rules' previous communications plans and will contact you today with those lists for you to review and adjust as needed. She'll provide the timeframe for review; I anticipate it will be soon, so I'm letting you know both of the pending announcement and her need for your help.

The rules are listed here: [https://www.epa.gov/system/files/documents/2025-03/neshap\\_powering-the-great-american-comeback\\_fact-sheet\\_2.pdf](https://www.epa.gov/system/files/documents/2025-03/neshap_powering-the-great-american-comeback_fact-sheet_2.pdf)

Best,



\*\*\*\*\*

[REDACTED]  
Sector Policies and Programs Division, Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
[REDACTED]

Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 11:57:20 AM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]

presidential exemption guidance goes live this afternoon FYI im in the PACS email chain since i asked as bunch of questions

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 12:07:34 PM  
**To:** [REDACTED]@epa.gov]

Presidential exemption language goes live later this afternoon

Task

---

**Subject:** Presidential Exemption -- text and communication plan

**Due Date:** 3/21/2025

**Status:** Completed

**Percent** 1

**Complete:**

**Owner:**



Task

---

**Subject:** Presidential Exemption -- text and communication plan

**Due Date:** 3/21/2025

**Status:** Completed

**Percent** 1

**Complete:**

**Owner:**



## Appointment

---

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5E79C11CE545488A8E7D4010C82C4D75-665E2220-36]  
**on behalf of** Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]  
**Sent:** 3/7/2025 7:43:29 PM  
**To:** Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]; DCRoomWJCN5406/OARAA [DCRoomWJCN5406OARAA@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]; Szabo, Aaron [Szabo.Aaron@epa.gov]; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; Tisa, Nathaniel [Tisa.Nathaniel@epa.gov]; Payne, James (Jim) [payne.james@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov  
**BCC:** RTP-C401A-Max40/RTP-Bldg-C [RTP-C401A-Max40-RTP-Bldg-C@epa.gov]  
**Subject:** Hybrid: Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension.  
**Attachments:** 2025.02.27\_OAR Internal meeting request\_Commercial-Sterilizers.docx  
**Location:** Microsoft Teams Meeting; RTP-C401A-Max40/RTP-Bldg-C; DCRoomWJCN5406/OARAA  
**Start:** 3/19/2025 3:15:00 PM  
**End:** 3/19/2025 4:00:00 PM  
**Show Time As:** Busy

**Required Attendees:** DCRoomWJCN5406/OARAA; Dominguez, Alexander; Szabo, Aaron; [REDACTED]; Tisa, Nathaniel; Payne, James (Jim); [REDACTED]  
**Optional Attendees:** [REDACTED]

---

## Microsoft Teams [Need help?](#)

### Ex. 6 Personal Privacy (PP)

Meeting ID: [REDACTED]  
Passcode: [REDACTED]

### Dial in by phone

[REDACTED] United States, Richmond Beach  
Phone conference ID: [REDACTED]

### Join on a video conferencing device

Tenant key: [slotteams/0/video.epa.gov](#)  
Video ID: [REDACTED]

[More info](#)

For organizer: **Ex. 6 Personal Privacy (PP)**

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

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[ SEQ CHAPTER \h \r 1]OAR Meeting Request Form  
Abigale Tardif

**Date of this Request:** February 27, 2025

**Scheduling Point of Contact:** [REDACTED]

**Subject:** Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension.

**Purpose:** Provide summary of EPA's 2024 Commercial Sterilizers NESHAP RTR rulemaking, litigation status and petitions, and discuss the CAA section 112(i)(4) Presidential compliance extension process.

**First possible date for meeting:** March 7, 2025

**Last possible date for meeting:** March 13, 2025

**Duration:** 45 minutes

**Reasons for Requested Dates/Duration:** We believe it would be beneficial to have this briefing before the OAR meeting with industry on 3/6/2025 titled "Clean Air Action Section 112."

**Requested Meeting Format** (select one):

Virtual

☒ Hybrid (in-person and virtual option; pending in-office availability of leadership team)

**Invitees** (please list invitees by Office and in the following format: *Last, First, (ex. Blossom, Cherry)*)

OAR

Tardif, Abigale; Dominguez, Alexander; Szabo, Aaron

OAQPS

[REDACTED]

OGC

[REDACTED] Payne, James; Tisa, Nathaniel;

\*Please submit this OAR internal meeting request form to [ [HYPERLINK "mailto:OAR\\_Scheduling@epa.gov"](mailto:OAR_Scheduling@epa.gov) ]

\*Briefing materials should be submitted to [ [HYPERLINK "mailto:OAR\\_Briefings@epa.gov"](mailto:OAR_Briefings@epa.gov) ] by 3 pm one working day prior to the meeting



**From:** [REDACTED] [/o=ExchangeLabs/ou=Exchange Administrative Group  
(FYDIBOHF23SPDLT)/cn=Recipients/cn=ce5a954491df4dd2a084ba5befaa11de-[REDACTED]]  
**on behalf of** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP  
(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D19C179F3CCB4FADB48E3AE85563F132-[REDACTED]]  
**Sent:** 2/28/2025 6:01:28 PM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov;  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
[REDACTED]@epa.gov; [REDACTED]@epa.gov]  
**BCC:** RTP-C401A-Max40/RTP-Bldg-C [RTP-C401A-Max40-RTP-Bldg-C@epa.gov]  
**Subject:** Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension.  
**Attachments:** 2025.02.28\_OAQPS Meeting Request Form Peter\_Commercial-Sterilizers-revised.docx;  
2025.03.03\_1600\_EtOSterilizersBriefing.OAQPS.docx  
**Location:** Microsoft Teams Meeting; RTP-C401A-Max40/RTP-Bldg-C  
**Start:** 3/3/2025 9:00:00 PM  
**End:** 3/3/2025 9:45:00 PM  
**Show Time As:** Busy

**Required Attendees:** [Redacted]  
[Redacted]  
[Redacted]  
**Optional Attendees:** [Redacted]  
[Redacted]

Meetings materials now attached.

## Microsoft Teams [Need help?](#)

[Need help?](#)

## Ex. 6 Personal Privacy (PP)

Meeting ID: **Ex. 6 Personal Privacy (PP)**  
Passcode:

### Dial in by phone

Ex. 6 Personal Privacy (PP) United States, Washington

Phone conference ID: Ex. 6 Personal Privacy (PP)

## Join on a video conferencing device

Tenant key: slpsteamis@video.epa.gov

Video ID: **Ex. 6 Personal Privacy (PP)**

[More info](#)

For organizers: **Ex. 6 Personal Privacy (PP)**

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

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[ SEQ CHAPTER \h \r 1]OAQPS Meeting Request Form

For [REDACTED]

Do not use bold, highlight or underline text that you enter.

**Date of this Request:** 02/27/25

**Scheduling Point of Contact:** [REDACTED] (1-4860)

**Technical Point of Contact:** [REDACTED] (1-7689)

**Lead Technical Point of Contact:** [REDACTED] (1-5645)

**Subject:** Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension.

**Purpose:** Provide summary of EPA's 2024 Commercial Sterilizers NESHAP RTR rulemaking, litigation status and petitions, and discuss the CAA section 112(i)(4) Presidential compliance extension process.

- Next ADP Milestone: (specify early guidance, options selection, etc.); meeting scheduled on: \_\_/\_\_/\_\_;
- If applicable, due date to: OP / / ( days review); OMB: / / ( days review);
- Legal deadline: Settlement agreement due date is \_\_/\_\_/\_\_.
- Other firm deadline

**First possible date for meeting:** 3/3/2025 (note: from 4:00 to 4:45pm, if possible)

**Last possible date for meeting:** 3/3/2025

**Duration:** 45 minutes

**Requested Audio / Video** (Mark with "X" if requested)

☒ **Video Location(s):**

List video locations needed (e.g., Microsoft Office Teams, RTP, DC, Regions) HQ will set up a bridge if needed

☐ **HQ Conference Line:**

If requested, HQ staff will provide in meeting invite

☐ **Non-HQ Conference Line:**

If you plan to use a non-HQ conference line, include it here

**Invitees (please list by Office and in Outlook format, e.g. Last, First):**

Please include the key OGC and/or Regional representatives as appropriate. Only key invitees are listed by office; others are Cc:

Office/Org                      Name (Last, First)

OAQPS

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

OGC

[REDACTED]

Schedulers to Cc:

[REDACTED];

**HQ Meeting Briefing Materials: Must provide to OAQPS IO by Noon, 1 day before meeting.**

Revised 8/2021

## Appointment

---

**From:** [REDACTED] [Tardif.Abigale@epa.gov]  
**on behalf of** Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]  
**Sent:** 3/11/2025 4:53:04 PM  
**To:** Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]; DCRoomWJCN5406/OARAA [DCRoomWJCN5406OARAA@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]; Szabo, Aaron [Szabo.Aaron@epa.gov]; [REDACTED] [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; Tisa, Nathaniel [Tisa.Nathaniel@epa.gov]; Payne, James (Jim) [payne.james@epa.gov]; [REDACTED]@epa.gov  
**CC:** [REDACTED]@epa.gov  
**BCC:** RTP-C401A-Max40/RTP-Bldg-C [RTP-C401A-Max40-RTP-Bldg-C@epa.gov]  
**Subject:** Hybrid: Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension.  
**Attachments:** 2025.02.27\_OAR Internal meeting request\_Commercial-Sterilizers.docx  
**Location:** Microsoft Teams Meeting; RTP-C401A-Max40/RTP-Bldg-C; DCRoomWJCN5406/OARAA  
**Start:** 3/19/2025 3:15:00 PM  
**End:** 3/19/2025 4:00:00 PM  
**Show Time As:** Busy

**Required Attendees:** DCRoomWJCN5406/OARAA; Dominguez, Alexander; Szabo, Aaron; [REDACTED];  
**Optional Attendees:** [REDACTED]; Tisa, Nathaniel; Payne, James (Jim); [REDACTED]

---

## Microsoft Teams [Need help?](#)

### Ex. 6 Personal Privacy (PP)

Meeting ID: [REDACTED]  
Passcode: [REDACTED]

### Dial in by phone

[REDACTED] United States, Richmond Beach

Phone conference ID: [REDACTED]

### Join on a video conferencing device

Tenant key: s\p\teams@video.epa.gov

Video ID: [REDACTED]

More info

For organizers: **Ex. 6 Personal Privacy (PP)**

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

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## Appointment

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**From:** Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]  
**Sent:** 3/6/2025 1:33:22 PM  
**To:** Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]; DCRoomWJCN5406/OARAA [DCRoomWJCN5406OARAA@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]; Szabo, Aaron [Szabo.Aaron@epa.gov]; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; Tisa, Nathaniel [Tisa.Nathaniel@epa.gov]; Payne, James (Jim) [payne.james@epa.gov]; [REDACTED]@epa.gov  
**CC:** [REDACTED]@epa.gov  
**BCC:** RTP-C401A-Max40/RTP-Bldg-C [RTP-C401A-Max40-RTP-Bldg-C@epa.gov]  
**Subject:** Hybrid: Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension.  
**Attachments:** 2025.02.27\_OAR Internal meeting request\_Commercial-Sterilizers.docx  
**Location:** Microsoft Teams Meeting; RTP-C401A-Max40/RTP-Bldg-C; DCRoomWJCN5406/OARAA  
**Start:** 3/19/2025 3:15:00 PM  
**End:** 3/19/2025 4:00:00 PM  
**Show Time As:** Busy

**Required Attendees:** DCRoomWJCN5406/OARAA; Dominguez, Alexander; Szabo, Aaron; [REDACTED];  
**Optional Attendees:** [REDACTED]; Tisa, Nathaniel; Payne, James (Jim); [REDACTED]

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## Microsoft Teams [Need help?](#)

### Ex. 6 Personal Privacy (PP)

Meeting ID: Ex. 6 Personal Privacy (PP)  
Passcode:

### Dial in by phone

Ex. 6 Personal Privacy (PP) United States, Richmond Beach

Phone conference ID: Ex. 6 Personal Privacy (PP)

### Join on a video conferencing device

Tenant key: [30ptteams@video.epa.gov](mailto:30ptteams@video.epa.gov)

Video ID: Ex. 6 Personal Privacy (PP)

[More info](#)

For organizers: **Ex. 6 Personal Privacy (PP)**

This meeting may be recorded. If the meeting is recorded, it will be announced via a banner showing "this meeting is being recorded." Participation in a recorded meeting will be deemed as consent to be recorded. Meeting recordings may be official agency records subject to appropriate policy, rules and regulations.

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Message

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**From:** AirAction [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA78B98923384078995E04A73D258D83-AIRACTION]  
**Sent:** 3/28/2025 3:25:38 PM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**CC:** [REDACTED]@epa.gov  
**Subject:** FW: NESHAP: Ethylene Oxide Emissions Standards for Sterilization Facilities (89 FR 24090) (Sterilizer Rule); Becton Dickinson and Company facilities

Hi all – We have received another Presidential Exemption request. For awareness, please see the email below.

Nothing was attached to the email request.

**From:** Travis Anderton <travis\_anderton@bd.com>  
**Sent:** Thursday, March 27, 2025 4:39 PM  
**To:** AirAction <AirAction@epa.gov>  
**Subject:** NESHAP: Ethylene Oxide Emissions Standards for Sterilization Facilities (89 FR 24090) (Sterilizer Rule); Becton Dickinson and Company facilities

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

Dear Administrator Zeldin,

Consistent with EPA's request dated March 24, 2025, encouraging the regulated community to request a Presidential Exemption for compliance under section 112(i)(4) of the Clean Air Act (CAA) by March 31, 2025, Becton Dickinson and Company (BD) is requesting that the President issue a two-year exemption pursuant to his authority under CAA Section 112(i)(4) for all emission standards, monitoring requirements and any other applicable requirements in EPA's April 4, 2024 *National Emission Standards for Hazardous Air Pollutants: Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review*, 89 FR 24090 (April 5, 2024) (Sterilizer Rule). BD requests this two-year compliance exemption for the following facilities which are regulated by the Sterilizer Rule and all sources therein:

Becton Dickinson and Company  
BD Covington  
8195 Industrial Boulevard  
Covington, Georgia

Becton Dickinson and Company  
BD Madison  
1211 Mary Magnan Boulevard  
Madison, Georgia

Becton Dickinson and Company  
BD Medical  
9450 South State Street  
Sandy, Utah

Becton Dickinson and Company  
BD Medical Pharmaceutical Systems  
920 East 19th Street  
Columbus, Nebraska



Becton Dickinson and Company  
Edwards Lifesciences Technology Sàrl  
Parque Industrial Carr. PR-402, Km. 1.4 N  
Anasco, Puerto Rico

**BD requests that the President issue a two-year exemption for compliance related to the new Sterilizer Rule.**

**Specifically:**

- For standards set or revised under CAA Section 112(f) and all corresponding requirements (including monitoring requirements), the exemption should apply as of April 6, 2026 (the compliance deadline for those standards);
- For standards set or revised under CAA Section 112(d) and all corresponding requirements (including monitoring requirements), the exemption should apply as of April 5, 2027 (the compliance deadlines for those standards).

**An extension is requested to ensure that the technology used to comply with the standard is available, capable, and reliable:**

Despite our best efforts, BD may not meet the April 6, 2026 compliance deadline. Although we started planning and design activities well in advance of the issuance of the new rule, the time necessary to execute very complex plant upgrades will likely exceed the compliance deadline(s). These upgrades require a methodical approach to engineering, procurement, and construction, including but not limited to: project planning, supplier qualification, facility and equipment design, procurement, permitting and approval by State and local authorities, construction of facilities, equipment installation, commissioning and validation, as well as training. Many of the systems and equipment necessary to meet the new rule are not off-the-shelf solutions. Each facility is unique, requiring highly customized solutions and will require careful integration and testing to ensure full compliance with various regulations and to avoid compromised safety of the operation, reliability of the plant and equipment, and to avoid disruption of supply.

It is questionable whether even the best control technologies can meet the requirements of the new rule under all operating conditions. For example, it is questionable whether or not certain emissions control devices can meet minimum DRE requirements under low inlet conditions such as would be expected during periods of low production, reduced operating capacity, plant shutdown/startup, and other atypical operating scenarios. It is also questionable whether current technology for the control of Group 1 and Group 2 emissions can meet the minimum DRE requirements under all operating conditions. Product type and volume sterilized at each facility vary widely and may be subject to swings in market demand among other external factors.

Additionally, the lead time of various materials and equipment required for the plant upgrades is variable. For example, the lead time of emissions control equipment is approximately 12-18 months and there is only a limited number of vendors who can supply this equipment, and the lead time for high voltage transformers and electrical switch gear are currently 12 months or greater. In some cases additional utility requirements necessitate the involvement of the public utility company to increase local or regional capacity which may add additional complexity and time to project schedules. Furthermore, BD anticipates additional financial burden and import/customs clearance complexity with the import of custom emissions control equipment specific to the Covington, Georgia and Madison, Georgia facility which add additional financial burden and lead time for delivery of such equipment due to current and pending tariffs.

**An extension is in the national security interests of the United States for the following reasons:**

BD supplies billions of sterile medical devices that enable healthcare providers to safely provide a variety of life saving therapies to patients in the US and around the world. Additionally, BD is a key supplier to the US Government.

Medical devices must be sterilized to prevent the spread of bacteria, viruses, and other pathogens, like methicillin-resistant *Staphylococcus aureus* ("MRSA"), HIV, and hepatitis B, that can lead to deadly infections. While BD sites deploy a variety of sterilization methods, approximately 50% of BD products currently can only be sterilized with EtO, including IV catheters, PICC catheters, surgical prep devices, surgical kits, Foley urinary catheter trays, glass syringes, chemotherapy ports, among many others. A more detailed summary of several of these products are outlined below.

BD produces sterile vascular access devices that allow healthcare providers to safely give medications, hydration and nutritional fluid therapies, and blood products to patients used both in the hospital as well as in outpatient areas of healthcare. Up to 90 % of hospitalized patients require IV therapy, and over 95% of the devices used are peripheral IV

catheters ("PIVC"). This corresponds to over 1 billion peripheral IV insertions being performed worldwide, annually. BD supplies a significant portion of IV catheters to the US market.

BD produces drug delivery devices that improve a patient's quality of life, including ready-to-fill syringes that are used to deliver drugs and vaccines indicated to prevent invasive diseases, reduce the risks of life changing conditions like heart attacks and strokes, as well as treat chronic conditions such as Crohn's disease, arthritis and diabetes. A large majority of the injectable biotech drugs delivered subcutaneously or intramuscularly are delivered in BD's sterile Prefillable Syringes. Many of the top bio-pharma companies rely heavily on BD for these products.

BD also produces devices used to diagnose and treat patients with cancer (especially breast, liver and blood cancers), end-stage-renal disease, peripheral arterial disease, complex abdominal hernia and reconstruction, and hemostasis to prevent bleeding during advanced surgical procedures. Our products are used in the majority of patients undergoing surgery in these areas and those in intensive care/post-operative care units.

BD utilizes EtO sterilization because it is the only method of sterilization that can be used for these products. As EPA explains, "Commercial sterilization facilities play a vital role in maintaining an adequate supply of medical devices. According to the U.S. Food and Drug Administration (FDA), 'Literature shows that about fifty percent of all sterile medical devices in the U.S. are sterilized with ethylene oxide.'" 88 Fed. Reg. 22,793.

As voiced directly to EPA during the public comment period BD believes that the technical complexity of the new rules and the aggressive compliance deadline threaten supply continuity for critical medical products. BD respectfully requests extension to the compliance deadline to ensure upgrades are designed, constructed, and commissioned in accordance with all applicable regulatory requirements and industry standards while maintaining safe operations and avoiding unnecessary supply disruptions that would threaten or diminish the standard of care for patients.

BD appreciates EPA's attention to this important matter and request the exemption be granted as quickly as possible.

Respectfully,

Travis Anderton

**BD**

Travis Anderton  
Vice President, Sterilization

\*\*\*\*\*

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\*\*\*\*\*

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\*\*\*\*\*

Corporate Headquarters Mailing Address: BD (Becton, Dickinson and Company) 1 Becton Drive Franklin Lakes, NJ 07417 U.S.A.

BD Restricted

Message

**From:** Toomey, Megan A  
[Megan.Toomey@talenenergy.com]  
**Sent:** 3/31/2025 3:27:12 PM  
**To:** Tardif, Abigale (Abbie)  
[Tardif.Abigale@epa.gov]  
**Subject:** RE: Talen Energy Follow-Up

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

Awesome ~ thanks, Abbie!

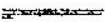
**From:** Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
**Sent:** Monday, March 31, 2025 10:48 AM  
**To:** Toomey, Megan A <Megan.Toomey@talenenergy.com>  
**Subject:** RE: Talen Energy Follow-Up

[External Email]

Megan-

Thank you for sending this over. I have reached out to my scheduling team to find time for us to chat. They should send you an email in the coming days.

Best,  
Abbie

  
Abigale Tardif  
Principal Deputy Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
Office: (202) 564-7017

**From:** Toomey, Megan A <Megan.Toomey@talenenergy.com>  
**Sent:** Monday, March 31, 2025 8:24 AM  
**To:** Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
**Subject:** Talen Energy Follow-Up

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

Good Morning, Abbie ~

It was a pleasure meeting you last week.

Two things I wanted to make you aware of:

- 1) The MATS 2yr exemption request for Colstrip was submitted on Friday (a copy is attached).

2) I'd like to schedule additional time with you to discuss MATS and other air reg priorities for Talen.

Regarding #2, please let me know what will work for your schedule.

Thanks!

**Megan Toomey**

Vice President | Environmental Affairs | Talen Energy

[Megan.Toomey@TalenEnergy.com](mailto:Megan.Toomey@TalenEnergy.com)

Office: 610.601.0216 | Mobile: 816.872.7752

600 Hamilton Street, Suite 600 | Allentown, PA 18101



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Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/20/2025 4:21:02 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
**Subject:** FW: EPA Fact Sheet regarding reconsideration of the MATS RTR published on 3/12/2025  
**Importance:** High

See below. Is there a plan for how we respond to inquiries regarding the CAA 112(i)(4) presidential exemption that was mentioned in all of the deregulatory Fact Sheets ... with a deadline of March 31"?

Who does it got to? What information is expected?

I got a call yesterday from someone asking those questions and I had no answers for the caller.

Nick

**From:** [REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 12:16 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** FW: EPA Fact Sheet regarding reconsideration of the MATS RTR published on 3/12/2025  
**Importance:** High

[REDACTED],

We have a question (below) from TVA asking how to apply for the Presidential Exemption mentioned in the MATS reconsideration Fact Sheet. What should we tell them?

Thanks,

[REDACTED]

[REDACTED]  
Environmental Engineer | Air Toxics Coordinator | Air and Radiation Division  
U.S. Environmental Protection Agency, Region 4 | 61 Forsyth Street, SW | Atlanta, GA 30303  
Voice: 404-562-9039 | Fax: 404-562-9066 | Email: [REDACTED]

**From:** [REDACTED]@epa.gov>  
**Sent:** Thursday, March 20, 2025 12:05 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** FW: EPA Fact Sheet regarding reconsideration of the MATS RTR published on 3/12/2025  
**Importance:** High

[REDACTED]

Please see below. Can ARD follow up with Tracy Stanton of TVA regarding the MATS reconsideration rulemaking question?

Thanks,

**From:** Stanton, Tracy Palmer <tpstanton@tva.gov>

**Sent:** Thursday, March 20, 2025 10:25 AM

**To:** [REDACTED] <[REDACTED]@epa.gov>

**Subject:** EPA Fact Sheet regarding reconsideration of the MATS RTR published on 3/12/2025

**Importance:** High

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

Jason,

I was hoping that maybe you could answer a question for me or point me in the direction of someone who can...

EPA published a [Fact Sheet on 3/12/25 regarding reconsideration of the MATS RTR](#). On the very top of page 2 of the document, it states that "Any source interested in a Presidential exemption, should provide their recommendations to EPA by March 31, 2025."

Who at EPA does this go to specifically? There is not much time until 3/31/25, so I want to make sure I know where this needs to go in case TVA decides one is warranted.

Thanks for your help!



Tracy P. Stanton  
Air Specialist IV  
Air Permits, Compliance and Monitoring



M. 865-209-6940 E. [tpstanton@tva.gov](mailto:tpstanton@tva.gov)  
400 West Summit Hill Drive, Knoxville, TN 37902

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Message

From: [REDACTED]@epa.gov]  
Sent: 3/6/2025 4:33:19 PM  
To: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
Subject: RE: meetings with Abbie Tardif

Thanks!

[REDACTED]  
(202) 564-5571

From: [REDACTED]@epa.gov>  
Sent: Thursday, March 6, 2025 11:09 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: meetings with Abbie Tardif

Yes! Sorry! The order is:

3/12	Wednesday	12:15 PM	CAA Section 112(f) Risk Reviews
3/14	Friday	3:15 PM	Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension

I will get Amy on both.

Best,

[REDACTED]

---

[REDACTED]  
OAR/OAQPS  
Office: (919) 541-0573 cell: [REDACTED]  
[REDACTED]@epa.gov

From: [REDACTED]@epa.gov>  
Sent: Thursday, March 6, 2025 10:54 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: meetings with Abbie Tardiff

Apart from [REDACTED]'s attendance at both meetings, I'd thought we were trying to do risk first, then sterilizers. [REDACTED], is it possible to switch the order of these two briefings, if we need to?

From: [REDACTED]@epa.gov>  
Sent: Thursday, March 6, 2025 10:52 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: meetings with Abbie Tardiff

Yes, that's the meeting – next Wednesday 3/12 at 12:15 on sterilizers and the presidential exemption.



I just received an invitation to a meeting on Friday 3/14 at 3:15 to discuss risk. Can [REDACTED] also be substituted for me on that one too?

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Thursday, March 6, 2025 10:08 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** RE: meetings with Abbie Tardiff

I defer to [REDACTED] but I'm pretty sure that is the one.

I thought that is the same date and time as the (f)(2)/risk discussion?

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Thursday, March 6, 2025 9:47 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** RE: meetings with Abbie Tardiff

Sure. Just to confirm, you want to sub in [REDACTED] on the 3/12 12:15 Hybrid: Commercial Sterilizers NESHAP RTR and CAA section 112(i)(4) "Presidential Exemption" Compliance Extension meeting?

Best,

[REDACTED]  
[REDACTED]  
OAR/OAQPS  
Office: (919) 541-0573 cell: [REDACTED]  
[REDACTED]@epa.gov

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Thursday, March 6, 2025 9:43 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** RE: meetings with Abbie Tardiff

Hi [REDACTED]

Can you help with OGC's request below?

Best,

[REDACTED]

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Thursday, March 6, 2025 9:35 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** meetings with Abbie Tardiff

Do you happen to know who I should ask about adding an attorney to a meeting with AT? I'm going to be out next Wednesday when the sterilizer meeting is scheduled and want to see if I can add [REDACTED] in my place.

[REDACTED]  
Assistant General Counsel for the Air Toxics Practice Group  
Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
Phone: [REDACTED]

Message

From: [REDACTED]@epa.gov]  
Sent: 3/21/2025 9:21:40 PM  
To: [REDACTED]@epa.gov]  
CC: [REDACTED]@epa.gov]  
Subject: FW: email address for Presidential exemption requests

FYI....

[REDACTED] can you try to find the fact sheet for 112(i)(4). I don't know that I've seen that one. We did not draft it.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: Szabo, Aaron <Szabo.Aaron@epa.gov>  
Sent: Friday, March 21, 2025 5:10 PM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
Subject: Re: email address for Presidential exemption requests

[REDACTED] - thanks for the response [REDACTED] Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

With respect to the posting, your recommendation seems to go to me. Can we ask John Millett's team to put together a short press thing so we can post it on the EPA website with a link to it as well?

Thanks,

Aaron Szabo  
[REDACTED]

From: [REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 5:04:40 PM  
To: Szabo, Aaron <Szabo.Aaron@epa.gov>  
Cc: [REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
Subject: RE: email address for Presidential exemption requests

Aaron, I was able to connect with OGC and they have made a few edits to the writeup but there were also [REDACTED] Ex. 5 Deliberative Process (DP) I'm going to hold off on sending you the revised pager until Monday to allow OGC time to followup on [REDACTED] Ex. 5 Deliberative Process (DP) for you to think about.

I've cut and pasted excerpt of message below. I did ask them to follow up with the [REDACTED] experts first thing Monday morning.

From OGC....

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

(b) (5)

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

---

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Friday, March 21, 2025 2:13 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
**Subject:** RE: email address for Presidential exemption requests

Thanks [REDACTED]

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

---

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 2:13 PM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
**Subject:** RE: email address for Presidential exemption requests

I have not run it thru OGC yet but will do that today. I will circle back to you to confirm we can get this posted by Monday.

Thanks

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711

O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: Szabo, Aaron <Szabo.Aaron@epa.gov>  
Sent: Friday, March 21, 2025 2:07 PM  
To: [REDACTED]@epa.gov  
Cc: [REDACTED]@epa.gov; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
Subject: RE: email address for Presidential exemption requests

[REDACTED] this looks great. I provided some recommended edits and if you can run it through OGC (if you have not yet), to make sure they are good with it. I would like to get this up on the website Monday if that is possible.

I am still debating **Ex. 5 Deliberative Process (DP)** but I think we can hold off on that for now.

Let me know if you need anything from me.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 12:50 PM  
To: Szabo, Aaron <Szabo.Aaron@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
Subject: email address for Presidential exemption requests

Aaron,  
Per your request, we've have an email box dedicated to receive exemption requests under 112(i)(4). I'm attaching a short narrative to provide a bit more detail including the email address. One point to note for you is **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov



Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 4:00:54 PM  
**To:** [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** Re: SPPD Found it!

Great eye! Thanks!!

Get Outlook for iOS

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 10:50:10 AM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** SPPD Found it!

[REDACTED] is a genius and has an eagle-eye! This was in our NESHAP fact sheet that was posted on 3/12!

- Clean Air Act Section 112(i)(4) states the President of the United States may grant up to a 2-year exemption from compliance obligations for any source if the President finds that "the technology to implement such standard is not available and that is in the national security interests of the United States to do so."
  - Any source interested in a Presidential exemption, should provide their recommendations to EPA by March 31, 2025.
  - Sources need only provide why technology is unavailable and why it is in the national security interests of the United States to provide the exemption.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 10:45 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** FW: For Posting - Powering the Great American Comeback - Fact Sheets - OAR Compiled

I don't see it immediately online (I'm pretty sure it has been there at one point?). It's in this older fact sheet, which was changed right before going online. Is there a version of this fact sheet online that you know of that we could check to see if the date is still there?

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Wednesday, March 12, 2025 1:10 PM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** FW: For Posting - Powering the Great American Comeback - Fact Sheets - OAR Compiled

FYI heart attack review only

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Wednesday, March 12, 2025 12:07 PM  
**To:** [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>  
**Subject:** FW: For Posting - Powering the Great American Comeback - Fact Sheets - OAR Compiled

FYI

**From:** Dominguez, Alexander <dominguez.alexander@epa.gov>  
**Sent:** Wednesday, March 12, 2025 11:49 AM  
**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
**Cc:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <tardif.abigale@epa.gov>  
**Subject:** For Posting - Powering the Great American Comeback - Fact Sheets - OAR Compiled

[REDACTED] and [REDACTED]

Attached are the OAR fact sheets for today's announcements.

These have been reviewed by the three of us and OPA-IO.

Could you please do a quick review and clean them up (formatting, etc.,). Once finalized, please post each fact sheet separately to the corresponding EPA/OAR webpage at 4:00 PM today.

Our 12:00 PM was canceled, and we are now available 12:00 – 1:30 PM if you have any questions or would like to sit down and discuss.

Thank you,  
Alex

Alexander Dominguez  
Deputy Assistant Administrator  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
[REDACTED]

**From:** [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50505AF25AF9449AD34EE072A4F1E45-RDUNKINS]  
**Sent:** 3/19/2025 3:53:32 PM  
**To:** [REDACTED] [Nickerson.William@epa.gov]  
**Subject:** RE: Presidential Exemption for sterilizers

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: 919-541-5335 M: 919-605-1178  
[REDACTED]@epa.gov

### Ex. 5 Deliberative Process (DP)



From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Wednesday, March 19, 2025 10:04 AM  
To: [REDACTED] <[REDACTED]@epa.gov>  
Subject: RE: Presidential Exemption for sterilizers

I haven't seen anything on this other than the EPA Press Release. The press release talks about considering the 112(i)(4) exemption.

The CAA says "the President shall report to Congress with respect to each exemption (or extension thereof) made under this paragraph."  
**Ex. 5 Deliberative Process (DP)**

From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Wednesday, March 19, 2025 8:58 AM  
To: [REDACTED] <[REDACTED]@epa.gov>  
Subject: Presidential Exemption for sterilizers

Do you have any insight on this? **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

Message

From: [REDACTED] [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50505AF25AF94494AD34EE072A4F1E45-RDUNKINS]  
Sent: 3/21/2025 9:31:14 PM  
To: [REDACTED]@epa.gov  
Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I agree. We will work on cleaning up the document on Monday. Everyone has left for the day. If Aaron has other thoughts by Monday, I will share. His thought was if [REDACTED] **Ex. 5 Deliberative Process (DP)**  
[REDACTED] **Ex. 5 Deliberative Process (DP)** I have to put my hands on the 112(i)(4) fact sheet. We did not draft it and I think that's where this March 31<sup>st</sup> date that he mentions is listed. Stay tuned.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: [REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 5:24 PM  
To: [REDACTED]@epa.gov>  
Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I'm not going to do anything [REDACTED] in light of your 517p message. Let me know if I should still seek [REDACTED] advice.

-----  
[REDACTED]

From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 4:50 PM  
To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

[REDACTED]  
Go ahead and talk with the [REDACTED] staff. I will share with Aaron your concern and let him know we will follow up with him on Monday.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive

Research Triangle Park, NC 27711

O: [REDACTED] M: [REDACTED]

[REDACTED]@epa.gov

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 4:10 PM

To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_Edits.docx

Two notes from me. First, I think it would be good to have

Ex. 5 AC/DP

# Ex. 5 AC/DP

.....+++++

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 2:59 PM

To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_Edits.docx

It is my understanding that it is limited to 112(i)(4). If you have a suggestion please use redline/strikeout. As I will share any edits with Aaron.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711

O: [REDACTED] M: [REDACTED]

[REDACTED]@epa.gov

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 2:40 PM

To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

<[REDACTED]@epa.gov>

**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

## Ex. 5 Deliberative Process (DP)

comments, I wanted to check on the goal for this exercise.

[REDACTED]  
[REDACTED]

**From:** [REDACTED] <[REDACTED]@epa.gov>

**Sent:** Friday, March 21, 2025 2:32 PM

**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

**Cc:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

**Subject:** FW: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I just discussed with [REDACTED] that I wanted to get any OGC feedback on the draft announcement on setting up an email box for entities to request a compliance extension under 112(i)(4). OAR would like this to be posted by Monday. I told them I would seek your input/review today and circle back with them on whether we could get this posted by Monday. Let [REDACTED] know if you have any problems accessing the shared file linked below.

Link to shared file: [Ex. 5 Deliberative Process \(DP\)](#)

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** [REDACTED]

**Sent:** Friday, March 21, 2025 2:15 PM

**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

**Subject:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Please see Aaron's edits attached. We need to share with OGC for their review/input. Who should be on point for that? He would also like to have this posted on Monday. Let me know if that's possible.

Message

---

**From:** Szabo, Aaron [Szabo.Aaron@epa.gov]  
**Sent:** 3/21/2025 6:07:28 PM  
**To:** [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]  
**Subject:** RE: email address for Presidential exemption requests  
**Attachments:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

[REDACTED] – this looks great. I provided some recommended edits and if you can run it through OCC (if you have not yet), to make sure they are good with it. I would like to get this up on the website Monday if that is possible.

I am still debating Ex. 5 Deliberative Process (DP), but I think we can hold off on that for now.

Let me know if you need anything from me.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 12:50 PM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
**Subject:** email address for Presidential exemption requests

Aaron,  
Per your request, we've have an email box dedicated to receive exemption requests under 112(i)(4). I'm attaching a short narrative to provide a bit more detail including the email address. One point to note for you is Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov



Message

---

From: [REDACTED]@epa.gov]  
Sent: 3/21/2025 7:14:37 PM  
To: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I will be heading out around then, but I've reviewed and made suggested edits/commented on the document.

[REDACTED]  
[REDACTED]

From: [REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 3:06 PM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx


Will probably be about 4p before I can look at this, FYI.

-----++-----

[REDACTED]

From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 2:32 PM  
To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
Subject: FW: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I just discussed with [REDACTED] that I wanted to get any OGC feedback on the draft announcement on setting up an email box for entities to request a compliance extension under 112(i)(4). OAR would like this to be posted by Monday. I told them I would seek your input/review today and circle back with them on whether we could get this posted by Monday. Let Bebhinn know if you have any problems accessing the shared file linked below.

Link to shared file: 

**Ex. 5 Deliberative Process (DP)**

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: [REDACTED]  
Sent: Friday, March 21, 2025 2:15 PM

**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

**Subject:** 2025.03.21\_Presidential Exemption Directions\_Edits.docx

Please see Aaron's edits attached. We need to share with OGC for their review/input. Who should be on point for that? He would also like to have this posted on Monday. Let me know if that's possible.

Message

---

**From:** Szabo, Aaron [Szabo.Aaron@epa.gov]  
**Sent:** 3/21/2025 9:48:21 PM  
**To:** [REDACTED]@epa.gov  
**CC:** [REDACTED]@epa.gov; Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]  
**Subject:** Re: email address for Presidential exemption requests

Sounds great. Thanks!

Thanks,

Aaron Szabo  
[REDACTED]

---

**From:** [REDACTED]@epa.gov  
**Sent:** Friday, March 21, 2025 5:13:16 PM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Cc:** [REDACTED]@epa.gov; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
**Subject:** RE: email address for Presidential exemption requests

I've already got our comms team reaching out to OAR's team. We have a draft comms plan that we sent about an hour ago to John and Isabel. We should have that populated by Monday morning.

And thanks for the quick feedback on OGC concerns. I will follow up with everyone on Monday morning and turn around a new version to send to you.

[REDACTED]  
[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

---

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Friday, March 21, 2025 5:10 PM  
**To:** [REDACTED]@epa.gov  
**Cc:** [REDACTED]@epa.gov; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
**Subject:** Re: email address for Presidential exemption requests

Robin - thanks for the response. (b) (5)

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

With respect to the posting, your recommendation seems to go to me. Can we ask John Millett's team to put together a short press thing so we can post it on the EPA website with a link to it as well?

Thanks,



Aaron Szabo

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 5:04:40 PM

To: Szabo, Aaron <Szabo.Aaron@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>

Subject: RE: email address for Presidential exemption requests

Aaron, I was able to connect with OGC and they have made a few edits to the writeup but there were also [REDACTED] Ex. 5 Deliberative Process (DP). I'm going to hold off on sending you the revised pager until Monday to allow OGC time to followup on [REDACTED] Ex. 5 Deliberative Process (DP) for you to think about.

I've cut and pasted excerpt of message below. I did ask them to follow up with their (b) (5) experts first thing Monday morning.

From OGC.... [REDACTED] (b) (5) Ex. 5 Deliberative Process (DP)

**Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: Szabo, Aaron <Szabo.Aaron@epa.gov>

Sent: Friday, March 21, 2025 2:13 PM

To: [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>

Subject: RE: email address for Presidential exemption requests

Thanks Robin!

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 2:13 PM  
To: Szabo, Aaron <Szabo.Aaron@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
Subject: RE: email address for Presidential exemption requests

I have not run it thru OGC yet but will do that today. I will circle back to you to confirm we can get this posted by Monday.

Thanks

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: Szabo, Aaron <Szabo.Aaron@epa.gov>  
Sent: Friday, March 21, 2025 2:07 PM  
To: [REDACTED] <[REDACTED]@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
Subject: RE: email address for Presidential exemption requests

[REDACTED] this looks great. I provided some recommended edits and if you can run it through OGC (if you have not yet), to make sure they are good with it. I would like to get this up on the website Monday if that is possible.

I am still debating **Ex. 5 Deliberative Process (DP)** but I think we can hold off on that for now.

Let me know if you need anything from me.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 12:50 PM  
To: Szabo, Aaron <Szabo.Aaron@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>  
Subject: email address for Presidential exemption requests

Aaron,  
Per your request, we've have an email box dedicated to receive exemption requests under 112(b)(4). I'm attaching a short narrative to provide a bit more detail including the email address. One point to note for you is **Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: 919-541-5335 M: 919-605-1178  
[REDACTED]@epa.gov

Message

From: [REDACTED]@epa.gov]  
Sent: 3/24/2025 4:18:16 PM  
To: [REDACTED]@epa.gov]  
Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Me either.

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 12:00 PM  
To: [REDACTED]@epa.gov>  
Subject: Fw: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Well I never noticed these two gullets added to our fact sheet

Get Outlook for iOS

From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 11:01:01 AM  
To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I understood that [REDACTED] Ex. 5 Deliberative Process (DP) The fact sheet PDF regarding the reconsiderations and that appears on each individual affected rules website is here: [https://www.epa.gov/system/files/documents/2025-03/reshap\\_power\\_to-the-great-american-comeback\\_fact-sheet\\_2.pdf](https://www.epa.gov/system/files/documents/2025-03/reshap_power_to-the-great-american-comeback_fact-sheet_2.pdf)

The relevant language from this fact sheet copied here:

- Clean Air Act Section 112(i)(4) states the President of the United States may grant up to a 2-year exemption from compliance obligations for any source if the President finds that “the technology to implement such standard is not available and that is in the national security interests of the United States to do so.”
- Any source interested in a Presidential exemption, should provide their recommendations to EPA by March 31, 2025.
- Sources need only provide why technology is unavailable and why it is in the national security interests of the United States to provide the exemption.

Discussion of the exemption may appear other places; this is the one of which I’m aware.

From: [REDACTED] <[REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 10:25 AM  
To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>  
Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

The directions have changed a bit since I last reviewed it. [REDACTED] Ex. 5 Deliberative Process (DP)  
[REDACTED] Ex. 5 Deliberative Process (DP)



Ex. 5 Deliberative Process (DP)

(202) 564-5571

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Monday, March 24, 2025 9:44 AM

To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

CC: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_Edits.docx

Sorry to be late to the party. I had a few tweaks/additions to the paper.

[REDACTED]  
Deputy Associate General Counsel  
Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

T: [REDACTED]  
M: [REDACTED]  
E: [REDACTED]@epa.gov

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 4:50 PM

To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

CC: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_Edits.docx

Gautam,

Go ahead and talk with the [REDACTED] staff. I will share with Aaron your concern and let him know we will follow up with him on Monday.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711

O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 4:10 PM

To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_Edits.docx

Two notes from me. First, I think it would be good to have

Ex. 5 AC/DP

# Ex. 5 AC/DP

Ex. 5 AC/DP  
weekend to all.

Let us know if you want us to do that. Thanks and happy

.....+++++

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 2:59 PM

To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_Edits.docx

It is my understanding that Ex. 5 Deliberative Process (DP) If you have a suggestion please use redline/strikeout. As I will share any edits with Aaron.

[REDACTED], Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 2:40 PM

To: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_Edits.docx

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

I wanted to check on the goal for this exercise.

[REDACTED]

**From:** [REDACTED] <[REDACTED]@epa.gov>

**Sent:** Friday, March 21, 2025 2:32 PM

**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

**Cc:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

**Subject:** FW: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I just discussed with [REDACTED] that I wanted to get any OGC feedback on the draft announcement on setting up an email box for entities to request a compliance extension under 112(i)(4). OAR would like this to be posted by Monday. I told them I would seek your input/review today and circle back with them on whether we could get this posted by Monday. Let Bebhinn know if you have any problems accessing the shared file linked below.

Link to shared file: **Ex. 5 Deliberative Process (DP)**

[REDACTED] Senior Advisor  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
O: [REDACTED] M: [REDACTED]  
[REDACTED]@epa.gov

**From:** [REDACTED]

**Sent:** Friday, March 21, 2025 2:15 PM

**To:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>

**Subject:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Please see Aaron's edits attached. We need to share with OGC for their review/input. Who should be on point for that? He would also like to have this posted on Monday. Let me know if that's possible.

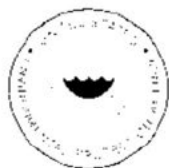
Message

From: [REDACTED]@epa.gov]  
Sent: 3/24/2025 7:13:25 PM  
To: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
CC: [REDACTED]@epa.gov]  
Subject: RE: OPA approval: upcoming OAR actions

And here are the live links:

<https://www.epa.gov/stationary-sources-air-pollution>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>



[REDACTED]  
U.S. EPA  
OAR/OAQPS

Call me on Teams

Mobile: [REDACTED]

Desk Phone: [REDACTED]

Email: [REDACTED]

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 3:12 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: FW: OPA approval: upcoming OAR actions

OPA and OPE(ngagement) have been notified that the pages are live thanks!

From: [REDACTED]  
Sent: Monday, March 24, 2025 3:08 PM  
To: Vaseliou, Molly <Vaseliou.Molly@epa.gov>; [REDACTED]@epa.gov>; Mandy, Cora  
<Mandy.Cora@epa.gov>; [REDACTED]@epa.gov>; Abboud, Michael <abboud.michael@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: RE: OPA approval: upcoming OAR actions

Thanks, Molly the pages are live --

<https://www.epa.gov/node/83201/revisions/2538570/view>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

Here are links to the comms plan and information for stakeholders and affected industry/facilities --

Communication Strategy: Ex. 5 Deliberative Process (DP)

Web text (and text for emails to stakeholders) - Ex. 5 Deliberative Process (DP)



**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>

**Sent:** Monday, March 24, 2025 3:01 PM

**To:** [REDACTED]@epa.gov; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]

[REDACTED]@epa.gov; Abboud, Michael <abboud.michael@epa.gov>

**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov

**Subject:** Re: OPA approval: upcoming OAR actions

Thanks! Adding Abboud for awareness.

Get Outlook for iOS

**From:** [REDACTED]@epa.gov

**Sent:** Monday, March 24, 2025 2:51:09 PM

**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]

[REDACTED]@epa.gov

**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov

**Subject:** RE: OPA approval: upcoming OAR actions

For awareness, this (noted below) will be live at 3pm today.

Desk statement

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules listed below, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

The Clean Air Act allows the President to exempt stationary sources of air pollution from compliance with any standard or limitation under section 112 for up to two years if the technology to implement the standard is not available and it is in the national security interests of the United States to do so.

**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>

**Sent:** Monday, March 24, 2025 9:28 AM

**To:** [REDACTED]@epa.gov; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]

[REDACTED]@epa.gov

**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov

**Subject:** RE: OPA approval: upcoming OAR actions

Sorry for the delayed review. I think we can stick with a desk statement for the second one.

**From:** [REDACTED]@epa.gov

**Sent:** Friday, March 21, 2025 6:15 PM

**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]

[REDACTED]@epa.gov

**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]

[REDACTED]@epa.gov

**Subject:** OPA approval: upcoming OAR actions

For OPA review. Note the second action, regarding a PR. Please let us know if you have a preferred approach.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:13 PM  
**To:** [REDACTED]@epa.gov>; AO OPA News Release Coord  
<AO\_OPA\_News\_Release\_Coord@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** Re: upcoming OAR actions

Got it! We'll flag for folks. Thanks for sending!

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:11:28 PM  
**To:** AO OPA News Release Coord <AO\_OPA\_News\_Release\_Coord@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** upcoming OAR actions

Hi all,

I have two things to flag for next week (the first I just heard about a half hour ago). I'll try to send a two week look-ahead next week, but things are coming up quickly over here!

Thanks,

[REDACTED]

- **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act**

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

*Timing:* Monday 3/24, afternoon

*Comms:* Desk statement, social media message (will send comms plan /desk statement Monday AM)

## Ex. 5 Deliberative Process (DP)

Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 7:14:29 PM  
**To:** Szabo, Aaron [Szabo.Aaron@epa.gov]; Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
**Subject:** RE: NESHAP Pres Exemptions

Better links here –

<https://www.epa.gov/stationary-sources-air-pollution>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 3:08 PM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
**Subject:** RE: NESHAP Pres Exemptions

The pages are live --

<https://www.epa.gov/node/88201/revisions/2538570/view>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Monday, March 24, 2025 1:40 PM  
**To:** [REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]  
**Subject:** RE: NESHAP Pres Exemptions

[REDACTED] – this looks good to me. If you can give OPE a heads up since I know they have gotten some questions on this, I would greatly appreciate it. I did not see the lists that this would go out to, but if we can send them to the lists of people who would receive information on these NESHAPs, I would greatly appreciate it.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** [REDACTED] <[REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:37 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander

<dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>

Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]

<[REDACTED]@epa.gov>

**Subject:** NESHAP Pres Exemptions

Hi Aaron, Abbie and Alex – Comms plan and web text linked below. Just wanted to check if industry, Hill, or intergov notifications are needed before or after the web goes live, or if we should just post this afternoon and leave it at that for today. OPA is plugged in, so we're good there, but if you like, we can flag for OCIR and public engagement (Mike Abboud & team), too, so they're aware.

At 3pm today OAQPS is planning post information in the banner of this website announcing that facilities can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for the nine NESHAPS identified in the [3.12 press release](#). The email box is live now and OAQPS staff have access to it.

The communication strategy has the desk statement and a social media post, and we can add a notification list if needed. There are a couple of q/a in the comms plan that will need fleshing out in case we're asked.

Communication Strategy: [\[icon\] 112 Presidential Exemptions -- announcing process -- Com Strategy.docx](#)

Web text (and text for emails to stakeholders) - [\[icon\] 2025.03.21\\_Presidential Exemption Directions\\_Egdlts.docx](#)

We'll proceed to post at 3pm, unless we hear otherwise.

Thanks

[REDACTED]

~~~~~

[REDACTED]



Message

---

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 6:48:41 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]  
**Subject:** RE: NESHAP Pres Exemptions

Thank you! I got it on the outlook with a couple of edits (that we talked about [REDACTED])

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:03 PM  
**To:** Millett, [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: NESHAP Pres Exemptions

Just submitted on Sprinklr

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:02 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: NESHAP Pres Exemptions

Yes, from EPAAir, then the main acct can retweet as/if they like.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 1:57 PM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: NESHAP Pres Exemptions

Thanks [REDACTED] Thinking social media would go out via EPAAir? Or do you think they'll want to do something from the main accounts?

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 1:50 PM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: NESHAP Pres Exemptions

You bet, Aaron OAQPS can reach out to their contacts that correspond to the 9 NESHAP categories, and I'll make sure that Mike Abboud and his team are aware. I'll update folks when the web page goes live at ~3. Thanks for the feedback!

[REDACTED]

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Monday, March 24, 2025 1:40 PM  
**To:** [REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>

Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
Subject: RE: NESHAP Pres Exemptions

[REDACTED] this looks good to me. If you can give OPE a heads up since I know they have gotten some questions on this, I would greatly appreciate it. I did not see the lists that this would go out to, but if we can send them to the lists of people who would receive information on these NESHAPs, I would greatly appreciate it.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

From: [REDACTED]@epa.gov  
Sent: Monday, March 24, 2025 11:37 AM  
To: Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
Subject: NESHAP Pres Exemptions

Hi Aaron, Abbie and Alex – Comms plan and web text linked below. Just wanted to check if industry, Hill, or intergov notifications are needed before or after the web goes live, or if we should just post this afternoon and leave it at that for today. OPA is plugged in, so we're good there, but if you like, we can flag for OCIR and public engagement (Mike Abboud & team), too, so they're aware.

At 3pm today OAQPS is planning post information in the banner of [this website](#) announcing that facilities can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for the nine NESHAPS identified in the [3-12 press release](#). The email box is live now and OAQPS staff have access to it.

The communication strategy has the desk statement and a social media post, and we can add a notification list if needed. There are a couple of q/a in the comms plan that will need fleshing out in case we're asked.

Communication Strategy: [\[W\] 112 Presidential Exemptions -- announcing process -- Com Strategy.docx](#)  
Web text (and text for emails to stakeholders) - [\[W\] 2025.03.21\\_Presidential Exemption Directions\\_ Egdits.docx](#)

We'll proceed to post at 3pm, unless we hear otherwise.

Thanks –





Message

From: [REDACTED]  
Sent: 3/19/2025 5:23:47 PM  
To: [REDACTED]@epa.gov]  
Subject: FW: Sterilizers briefing  
Attachments: EtO Reassessment Letter for Signature 3.18.2025.docx

I agree with [REDACTED] that the letter already signals (b) (5) [REDACTED] We

(b) (5)

I've attached the draft letter as FYI.

From: [REDACTED]  
Sent: Wednesday, March 19, 2025 1:18 PM  
To: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
Subject: RE: Sterilizers briefing

Thanks, Lea. We will start routing the letter through Quill.

From: [REDACTED]@epa.gov  
Sent: Wednesday, March 19, 2025 1:06 PM  
To: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov  
Subject: RE: Sterilizers briefing

I believe the current letter adequately signals [REDACTED] Ex. 5 Deliberative Process (DP) [REDACTED] I don't believe Aaron has seen the letter but was reacting to a question from me about how clear to be in the reconsideration letter about [REDACTED] Ex. 5 Deliberative Process (DP)

From: [REDACTED]@epa.gov  
Sent: Wednesday, March 19, 2025 12:25 PM  
To: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
<[REDACTED]@epa.gov>  
Subject: RE: Sterilizers briefing

Thanks for the report-out and update, [REDACTED]

[REDACTED], please let us know about edits to the letter responsive to Aaron's question; once that is settled, we can finalize the letter and put it into the correspondence system (Quill) for OAR signature.

Best,



[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Wednesday, March 19, 2025 12:12 PM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Subject: Sterilizers briefing

Hi all,

## Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) ?

Some other items of interest:

- Ex. 5 Deliberative Process (DP)
- Presidential exemption:
  - EPA will put out a notice with an email address for where folks can submit their information. May also include some information on what to submit/who can submit.
  - Ex. 5 Deliberative Process (DP)

Lea, please let me know if I got anything wrong.

Thank you,

[REDACTED]

Message

From: [REDACTED]  
Sent: 3/20/2025 1:27:55 PM  
To: [REDACTED]@epa.gov]  
CC: [REDACTED]@epa.gov]  
Subject: RE: Sterilizers briefing

Thanks, [REDACTED] I'll check with [REDACTED] I'd prefer to leave the later date just for the letter and "overdeliver", but the public-facing date may be more important to OAR.

From: [REDACTED]@epa.gov>  
Sent: Thursday, March 20, 2025 8:39 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: RE: Sterilizers briefing

[REDACTED] – Need to check with [REDACTED] on what we can say in this letter about

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) I got the sense from the schedules meeting with Aaron that OAR may want something sooner than March 2026.

[REDACTED]  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency

From: [REDACTED]@epa.gov>  
Sent: Wednesday, March 19, 2025 1:24 PM  
To: [REDACTED]@epa.gov>  
Subject: FW: Sterilizers briefing

I agree with [REDACTED] that the letter already signals

Ex. 5 Deliberative Process (DP)

We

Ex. 5 Deliberative Process (DP)

I've attached the draft letter as FYI.

From: [REDACTED]  
Sent: Wednesday, March 19, 2025 1:18 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: Sterilizers briefing

Thanks, [REDACTED]. We will start routing the letter through Quill.

From: [REDACTED]@epa.gov>

Sent: Wednesday, March 19, 2025 1:06 PM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Subject: RE: Sterilizers briefing

I believe the current letter adequately signals [REDACTED] Ex. 5 Deliberative Process (DP) I don't believe Aaron has seen the letter but was reacting to a question from me about how clear to be in the reconsideration letter about (b) (5) [REDACTED]

[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Wednesday, March 19, 2025 12:25 PM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>

Subject: RE: Sterilizers briefing

Thanks for the report-out and update, [REDACTED]

[REDACTED] please let us know about edits to the letter responsive to Aaron's question; once that is settled, we can finalize the letter and put it into the correspondence system (Quill) for OAR signature.

Best,

[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Wednesday, March 19, 2025 12:12 PM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov> [REDACTED]

<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Subject: Sterilizers briefing

Hi all,

## Ex. 5 Deliberative Process (DP)

Some other items of interest:

- [REDACTED] Ex. 5 Deliberative Process (DP)
- [REDACTED] presidential exemption:
  - EPA will put out a notice with an email address for where folks can submit their information. May also include some information on what to submit/who can submit.
  - [REDACTED] Ex. 5 Deliberative Process (DP)

Lea, please let me know if I got anything wrong.

Thank you,



Message

From: [REDACTED]  
Sent: 3/20/2025 4:32:45 PM  
To: [REDACTED]@epa.gov; [REDACTED]@epa.gov  
Subject: RE: Commercial Sterilizers - Enviro filed opposition to abeyance

Adding [REDACTED]

From: [REDACTED]  
Sent: Thursday, March 20, 2025 9:25 AM  
To: [REDACTED]@epa.gov  
Subject: FW: Commercial Sterilizers - Enviro filed opposition to abeyance

GM!

Thoughts on this? I apologize that I haven't had a chance to think through it before sending to you; I have to tend to a **Ex. 5 Deliberative Process (DP)** and will come back to this.

From: [REDACTED]@epa.gov  
Sent: Thursday, March 20, 2025 8:47 AM  
To: [REDACTED]@epa.gov; [REDACTED]@epa.gov  
Cc: [REDACTED]@epa.gov  
Subject: RE: Commercial Sterilizers - Enviro filed opposition to abeyance

CUI//PRIVILEGE

[REDACTED] - So looks like the **Ex. 5 Deliberative Process (DP)**

# Ex. 5 Deliberative Process (DP)

[REDACTED]  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency

Controlled by U.S. Environmental Protection Agency

From: [REDACTED]@epa.gov>  
Sent: Tuesday, March 18, 2025 5:08 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: FW: Commercial Sterilizers - Enviro filed opposition to abeyance

CUI//PRIVILEGE

Controlled by U.S. Environmental Protection Agency

From: [REDACTED]@epa.gov>  
Sent: Thursday, February 27, 2025 4:32 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: FYI: Commercial Sterilizers - Enviro filed opposition to abeyance

CUI//PRIVILEGE

They filed early (today). So our reply is now due next Thursday.

[REDACTED]

Controlled by U.S. Environmental Protection Agency

From: [REDACTED]  
Sent: Thursday, February 27, 2025 10:59 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: RE: Commercial Sterilizers

**Ex. 5 Attorney Client (AC)**

[REDACTED]  
Attorney-Advisor  
USEPA Office of General Counsel



[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Thursday, February 27, 2025 10:52 AM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>

Subject: RE: Commercial Sterilizers

[REDACTED] do you have access to the docket?

From: [REDACTED]@epa.gov>

Sent: Thursday, February 27, 2025 10:32 AM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>

Subject: RE: Commercial Sterilizers

## Ex. 5 Deliberative Process (DP)

[REDACTED]

Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency

From: [REDACTED]@epa.gov>

Sent: Thursday, February 27, 2025 9:21 AM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Subject: RE: Commercial Sterilizers

### Ex. 5 Deliberative Process (DP)

[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Thursday, February 27, 2025 9:17 AM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Subject: RE: Commercial Sterilizers

Thanks, [REDACTED] Ex. 5 Deliberative Process (DP)

From: [REDACTED]@epa.gov>  
Sent: Thursday, February 27, 2025 9:16 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: Commercial Sterilizers

## Ex. 5 Deliberative Process (DP)

[REDACTED]

From: [REDACTED]@epa.gov>  
Sent: Thursday, February 27, 2025 9:14 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: FW: Commercial Sterilizers

## Ex. 5 Deliberative Process (DP)

Thanks!

From: [REDACTED]@epa.gov>  
Sent: Thursday, February 27, 2025 9:07 AM  
To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: Commercial Sterilizers  
Importance: High

[REDACTED] Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

[REDACTED]

Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency

[REDACTED]





Message

---

**From:** [REDACTED]  
**Sent:** 3/24/2025 5:30:07 PM  
**To:** [REDACTED]@epa.gov]  
**Subject:** RE: Commercial sterilizers - Presidential Exemption in Fact Sheet

I'll let you know as soon as I see it!

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:48 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** RE: Commercial sterilizers - Presidential Exemption in Fact Sheet

CUI//PRIVILEGE

Thank you, [REDACTED] Can you let me know as soon as that announcement is out today? Thank you.

[REDACTED]  
Attorney-Advisor  
USEPA Office of General Counsel  
( [REDACTED] )

Controlled by U.S. Environmental Protection Agency

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:36 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** RE: Commercial sterilizers - Presidential Exemption in Fact Sheet

CUI//PRIVILEGE

Adding [REDACTED] as GLs and adding [REDACTED] for awareness of present interest and inquiries in the exemption.

As general info for Amy - this afternoon, the agency is announcing the possibility of obtaining a s. 112(i) Presidential exemption for the NESHAPs that were in the March 12 reconsideration announcement. There are fact sheets on the relevant NESHAP websites that mention the exemption. I don't know the process for handling the requests, and we should discuss how to handle EOSA's situation, since they put their "request" in a letter.

The exemption is mentioned in the PDF that appears on each affected NESHAP's website:

[https://www.epa.gov/system/files/documents/2025-03/neshap\\_powering-the-great-american-comeback\\_fact-sheet\\_2.pdf](https://www.epa.gov/system/files/documents/2025-03/neshap_powering-the-great-american-comeback_fact-sheet_2.pdf)

## Controlled by U.S. Environmental Protection Agency

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:14 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** FW: Commercial sterilizers - Presidential Exemption in Fact Sheet

CUI//PRIVILEGE

Hi:

EOSA is asking about the status of its Presidential Exemption Request that it made in response to EPA's fact sheet below. I was not aware of this fact sheet. Do you know who at EPA has been receiving these requests?

[REDACTED]  
Attorney-Advisor  
USEPA Office of General Counsel  
[REDACTED]

## Controlled by U.S. Environmental Protection Agency

**From:** [REDACTED]@usdoj.gov>  
**Sent:** Monday, March 24, 2025 11:05 AM  
**To:** [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** RE: Commercial sterilizers - signed letter attached.

CUI//PRIVILEGE

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

[REDACTED] - EOSA wants to know the status of their 112(i)(4) Presidential Exemption request for their compliance deadlines. It was something they requested in their letter to EPA, per EPA's factsheet:

[https://www.epa.gov/system/files/documents/2025-03/neshap\\_powering-the-great-american-comeback\\_fact-sheet\\_2.pdf](https://www.epa.gov/system/files/documents/2025-03/neshap_powering-the-great-american-comeback_fact-sheet_2.pdf)

Controlled by U.S. Environmental Protection Agency

From: [REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 1:05 PM  
To: [REDACTED]@usdoj.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@usdoj.gov>  
Subject: [EXTERNAL] RE: Commercial sterilizers - signed letter attached.

CUI//PRIVILEGE

Attached is the signed letter. Thank you for your patience.

[REDACTED]  
Attorney-Advisor  
USEPA Office of General Counsel  
[REDACTED]

Controlled by U.S. Environmental Protection Agency

From: [REDACTED]@usdoj.gov>  
Sent: Thursday, March 20, 2025 3:33 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@usdoj.gov>  
Subject: RE: Commercial sterilizers **Ex. 5 Attorney Client (AC)**

CUI//PRIVILEGE

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

Thank you! Once you have it, please send us the signed letter from Abbie after it's been sent to EOISA. Do you think it'll be signed today (or if not, what the timing on it is)?

Controlled by U.S. Environmental Protection Agency

From: [REDACTED]@epa.gov>  
Sent: Thursday, March 20, 2025 1:53 PM  
To: [REDACTED]@usdoj.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@usdoj.gov>  
Subject: [EXTERNAL] Re: Commercial sterilizers **Ex. 5 Attorney Client (AC)**

CUI//PRIVILEGE

They didn't look at the last version and signed off on the new path forward yesterday, so I think we're good to proceed.

[REDACTED]  
Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[REDACTED]

Controlled by U.S. Environmental Protection Agency

From: [REDACTED] <[REDACTED]@usdoj.gov>

Sent: Thursday, March 20, 2025 1:30:47 PM

To: [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@usdoj.gov>; [REDACTED]

<[REDACTED]@epa.gov>

Subject: RE: Commercial sterilizers [Ex. 5 Attorney Client (AC)]

CUI//PRIVILEGE

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

[REDACTED] Will EPA OGC FO need to review this?

Controlled by U.S. Environmental Protection Agency

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Thursday, March 20, 2025 10:31 AM

To: [REDACTED] <[REDACTED]@usdoj.gov>; [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@usdoj.gov>

Subject: [EXTERNAL] RE: Commercial sterilizers [Ex. 5 Attorney Client (AC)]

CUI//PRIVILEGE

Here are our comments/suggested edits. Let us know if you want to discuss any of our comments/edits. Thank you.

Attorney-Advisor  
USEPA Office of General Counsel

## Controlled by U.S. Environmental Protection Agency

From: [REDACTED] <[REDACTED]@usdoj.gov>

Sent: Wednesday, March 19, 2025 4:16 PM

To: [REDACTED] <[REDACTED]@epa.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@usdoj.gov>

Subject: RE: Commercial sterilizers [REDACTED] Ex. 5 Attorney Client (AC)

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

Thank you, [REDACTED]! Here's [REDACTED] Ex. 5 AC/AWP [REDACTED] Ex. 5 AC/AWP [REDACTED]. Can EPA review and send any edits/comments by COB tomorrow?

# Ex. 5 AC/AWP

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Wednesday, March 19, 2025 1:47 PM

To: [REDACTED] <[REDACTED]@usdoj.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@usdoj.gov>

Subject: [EXTERNAL] RE: Commercial sterilizers [REDACTED] Ex. 5 Attorney Client (AC)

[REDACTED] Ex. 5 AC/AWP

Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460



From: [REDACTED]@usdoj.gov>

Sent: Wednesday, March 19, 2025 11:37 AM

To: [REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@usdoj.gov>

Subject: RE: Commercial sterilizers Ex. 5 Attorney Client (AC)

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

Yes Ex. 5 AC/AWP

[REDACTED]  
Environmental Defense Section  
United States Department of Justice  
[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Wednesday, March 19, 2025 11:36 AM

To: [REDACTED]@usdoj.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@usdoj.gov>

Subject: [EXTERNAL] RE: Commercial sterilizers Ex. 5 Attorney Client (AC)

Thanks Eric. This is helpful! Ex. 5 AC/AWP

Ex. 5 AC/AWP

[REDACTED]  
Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[REDACTED]

From: [REDACTED]@usdoj.gov>

Sent: Wednesday, March 19, 2025 11:33 AM

To: [REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@usdoj.gov>

Subject: RE: Commercial sterilizers Ex. 5 Attorney Client (AC)

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



# Ex. 5 AC/AWP

Environmental Defense Section  
United States Department of Justice

From: [REDACTED] <[REDACTED]@epa.gov>

Sent: Wednesday, March 19, 2025 11:16 AM

To: [REDACTED] <[REDACTED]@usdoj.gov>

Cc: [REDACTED] <[REDACTED]@epa.gov>; [REDACTED] <[REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@usdoj.gov>

Subject: [EXTERNAL] RE: Commercial sterilizers Ex. 5 Attorney Client (AC)

## Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) Would appreciate [REDACTED]'s thoughts before I talk to [REDACTED] at 1pm.

Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

From: [REDACTED]@usdoj.gov>

Sent: Wednesday, March 19, 2025 10:57 AM

To: [REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@usdoj.gov>

Subject: RE: Commercial sterilizers - **Ex. 5 Attorney Client (AC)**

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

(adding [REDACTED])

# Ex. 5 AC/AWP

From: [REDACTED]@epa.gov>

Sent: Wednesday, March 19, 2025 10:03 AM

To: [REDACTED]@usdoj.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>

Subject: [EXTERNAL] RE: Commercial sterilizers **Ex. 5 Attorney Client (AC)**

Two more questions:

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

[REDACTED]  
Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[REDACTED]

From: [REDACTED]@usdoj.gov>

Sent: Wednesday, March 19, 2025 9:42 AM

To: [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: Commercial sterilizers [REDACTED] Ex. 5 Attorney Client (AC)

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

Attached. These both used declarations but I believe our plan here will be to use the letter that Abbie signs in lieu of a declaration. Nate attended the TSCA framework moot yesterday so is familiar with that case, which I would use as the template for the remand motion here (I already cribbed a lot from it for the current abeyance motion).

From: [REDACTED]@epa.gov>  
Sent: Wednesday, March 19, 2025 9:39 AM  
To: [REDACTED]@usdoj.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
Subject: [EXTERNAL] RE: Commercial sterilizers [REDACTED] Ex. 5 Attorney Client (AC)

Can you send me 1 [REDACTED] Ex. 5 Deliberative Process (DP) so I can understand the strategy? I can get a decision at my 1pm today with [REDACTED]

[REDACTED]  
Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[REDACTED]

From: [REDACTED]@usdoj.gov>  
Sent: Wednesday, March 19, 2025 9:37 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
Subject: RE: Commercial sterilizers [REDACTED] Ex. 5 Attorney Client (AC)

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

## Ex. 5 AC/AWP

What's the best way to tee this up?

From: [REDACTED]@epa.gov>  
Sent: Wednesday, March 19, 2025 9:32 AM  
To: [REDACTED]@usdoj.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>

Subject: [EXTERNAL] RE: Commercial sterilizers Ex. 5 Attorney Client (AC)

## Ex. 5 Deliberative Process (DP)

[REDACTED]  
Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[REDACTED]

From: [REDACTED]@usdoj.gov>

Sent: Wednesday, March 19, 2025 9:29 AM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>

Subject: Commercial sterilizers Ex. 5 Attorney Client (AC)

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

Hi all –

# Ex. 5 AC/AWP

Please let me know if you have any concerns with this path.

[REDACTED]  
Trial Attorney  
Environmental Defense Section  
Environment & Natural Resources Division  
U.S. Department of Justice  
[REDACTED]

Message

---

**From:** [REDACTED]  
**Sent:** 3/24/2025 5:57:05 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
**Subject:** FW: NESHAP Pres Exemptions

FYI.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 1:53 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** FW: NESHAP Pres Exemptions

FYI – we should plan on things going live at 3pm.

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Monday, March 24, 2025 1:40 PM  
**To:** [REDACTED]@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: NESHAP Pres Exemptions

[REDACTED] this looks good to me. If you can give OPE a heads up since I know they have gotten some questions on this, I would greatly appreciate it. I did not see the lists that this would go out to, but if we can send them to the lists of people who would receive information on these NESHAPs, I would greatly appreciate it.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:37 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** NESHAP Pres Exemptions

Hi Aaron, Abbie and Alex – Comms plan and web text linked below. Just wanted to check if industry, Hill, or intergov notifications are needed before or after the web goes live, or if we should just post this afternoon and leave it at that for today. OPA is plugged in, so we're good there, but if you like, we can flag for OCIR and public engagement (Mike Abboud & team), too, so they're aware.

At 3pm today OAQPS is planning post information in the banner of this website announcing that facilities can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for the nine NESHAPS identified in the [3.12 press release](#). The email box is live now and OAQPS staff have access to it.

The communication strategy has the desk statement and a social media post, and we can add a notification list if needed. There are a couple of q/a in the comms plan that will need fleshing out in case we're asked.

Communication Strategy: [\[redacted\] 112 Presidential Exemptions -- announcing process -- Com Strategy.docx](#)

Web text (and text for emails to stakeholders) - [\[redacted\] 2025.03.21\\_Presidential Exemption Directions\\_Egdlts.docx](#)

We'll proceed to post at 3pm, unless we hear otherwise.

Thanks



Office of Air & Radiation  
U.S. Environmental Protection Agency





Message

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**From:** [REDACTED]@epa.gov]  
**Sent:** 3/24/2025 1:29:07 PM  
**To:** Vaseliou, Molly [Vaseliou.Molly@epa.gov]; Mandy, Cora [Mandy.Cora@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: OPA approval: upcoming OAR actions

Sounds good. Thanks Molly!

**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>  
**Sent:** Monday, March 24, 2025 9:28 AM  
**To:** [REDACTED]@epa.gov]; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov>  
**Subject:** RE: OPA approval: upcoming OAR actions

Sorry for the delayed review. I think we can stick with a desk statement for the second one.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:15 PM  
**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** OPA approval: upcoming OAR actions

For OPA review. Note the second action, regarding a PR. Please let us know if you have a preferred approach.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:13 PM  
**To:** [REDACTED]@epa.gov>; AO OPA News Release Coord  
<AO\_OPA\_News\_Release\_Coord@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** Re: upcoming OAR actions

Got it! We'll flag for folks. Thanks for sending!

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:11:28 PM  
**To:** AO OPA News Release Coord <AO\_OPA\_News\_Release\_Coord@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** upcoming OAR actions

Hi all,

I have two things to flag for next week (the first I just heard about a half hour ago). I'll try to send a two week look-ahead next week, but things are coming up quickly over here!

Thanks,



- **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act**

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airactions@epa.gov](mailto:airactions@epa.gov).

*Timing:* Monday 3/24, afternoon

*Comms:* Desk statement, social media message (will send comms plan /desk statement Monday AM)

## **Ex. 5 Deliberative Process (DP)**

Message

From: [REDACTED]@epa.gov]  
Sent: 3/24/2025 6:50:17 PM  
To: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov];  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
CC: [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]  
Subject: RE: OPA approval: upcoming OAR actions



Thanks [REDACTED] All good on our end.

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 2:49 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
Subject: RE: OPA approval: upcoming OAR actions

Hi [REDACTED],

Regarding the Presidential Exemption action under section 112 of the CAA, we're going live at 3pm today with information in the banner of [this website](#) .

Statements and background in the comms plan --

Communication Strategy:  **Ex. 5 Deliberative Process (DP)**  
Web text (and text for emails to stakeholders) -  **Ex. 5 Deliberative Process (DP)**

Desk statement

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules listed below, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

The Clean Air Act allows the President to exempt stationary sources of air pollution from compliance with any standard or limitation under section 112 for up to two years if the technology to implement the standard is not available and it is in the national security interests of the United States to do so.

An exemption may be extended for up to two additional years and can be renewed, if appropriate.

I'll confirm when the page is live @ about 3.

Thanks,

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 10:25 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>  
Subject: FW: OPA approval: upcoming OAR actions

Please let us know when these are signed and live. Also, send any updated statements when ready. Flagging for OCIR and press awareness.

**Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act:** To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

## Ex. 5 Deliberative Process (DP)

Thanks!

**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>

**Sent:** Monday, March 24, 2025 9:28 AM

**To:** [REDACTED]@epa.gov; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov

**Subject:** RE: OPA approval: upcoming OAR actions

Sorry for the delayed review. I think we can stick with a desk statement for the second one.

**From:** [REDACTED]@epa.gov

**Sent:** Friday, March 21, 2025 6:15 PM

**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>

**Subject:** OPA approval: upcoming OAR actions

For OPA review. Note the second action, regarding a PR. Please let us know if you have a preferred approach.

**From:** [REDACTED]@epa.gov

**Sent:** Friday, March 21, 2025 6:13 PM

**To:** [REDACTED]@epa.gov; AO OPA News Release Coord  
<AO\_OPA\_News\_Release\_Coord@epa.gov>

**Cc:** [REDACTED]@epa.gov

**Subject:** Re: upcoming OAR actions

Got it! We'll flag for folks. Thanks for sending!

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:11:28 PM  
**To:** AO OPA News Release Coord <AO\_OPA\_News\_Release\_Coord@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** upcoming OAR actions

Hi all,

I have two things to flag for next week (the first I just heard about a half hour ago). I'll try to send a two week look-ahead next week, but things are coming up quickly over here!

Thanks,  
[REDACTED]

- **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act**

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

*Timing:* Monday 3/24, afternoon

*Comms:* Desk statement, social media message (will send comms plan /desk statement Monday AM)

- ## Ex. 5 Deliberative Process (DP)

Message

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 1:19:13 PM  
**To:** Vaseliou, Molly [Vaseliou.Molly@epa.gov]; Mandy, Cora [Mandy.Cora@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; Abboud, Michael [abboud.michael@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: OPA approval: upcoming OAR actions

Flagging this from below as well. OAR is posting at noon.

## Ex. 5 Deliberative Process (DP)

**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>  
**Sent:** Monday, March 24, 2025 3:01 PM  
**To:** [REDACTED]@epa.gov]; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; Abboud, Michael <abboud.michael@epa.gov>  
**Cc:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov>  
**Subject:** Re: OPA approval: upcoming OAR actions

Thanks! Adding Abboud for awareness.

Get Outlook for iOS

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:51:09 PM  
**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov>  
**Subject:** RE: OPA approval: upcoming OAR actions

For awareness, this (noted below) will be live at 3pm today.

### Desk statement

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules listed below, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

The Clean Air Act allows the President to exempt stationary sources of air pollution from compliance with any standard or limitation under section 112 for up to two years if the technology to implement the standard is not available and it is in the national security interests of the United States to do so.



From: Vaseliou, Molly <Vaseliou.Molly@epa.gov>

Sent: Monday, March 24, 2025 9:28 AM

To: [REDACTED]@epa.gov; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov

Subject: RE: OPA approval: upcoming OAR actions

Sorry for the delayed review. I think we can stick with a desk statement for the second one.

From: [REDACTED]@epa.gov

Sent: Friday, March 21, 2025 6:15 PM

To: Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>

Subject: OPA approval: upcoming OAR actions

For OPA review. Note the second action, regarding a PR. Please let us know if you have a preferred approach.

From: [REDACTED]@epa.gov

Sent: Friday, March 21, 2025 6:13 PM

To: [REDACTED]@epa.gov; AO OPA News Release Coord  
<AO OPA News Release Coord@epa.gov>

Cc: [REDACTED]@epa.gov

Subject: Re: upcoming OAR actions

Got it! We'll flag for folks. Thanks for sending!

From: [REDACTED]@epa.gov

Sent: Friday, March 21, 2025 6:11:28 PM

To: AO OPA News Release Coord <AO OPA News Release Coord@epa.gov>

Cc: [REDACTED]@epa.gov

Subject: upcoming OAR actions

Hi all,

I have two things to flag for next week (the first I just heard about a half hour ago). I'll try to send a two week look-ahead next week, but things are coming up quickly over here!

Thanks,  
[REDACTED]

- **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act**

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under

section 112(i)(4) of the Clean Air Act . A request for a Presidential Exemption may be submitted through [efr.docket.epa.gov](http://efr.docket.epa.gov).

*Timing:* Monday 3/24, afternoon

*Comms:* Desk statement, social media message (will send comms plan /desk statement Monday AM)

## **Ex. 5 Deliberative Process (DP)**



Message

**From:** [REDACTED]@epa.gov]  
**Sent:** 3/25/2025 1:19:29 PM  
**To:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]@epa.gov];  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]; [REDACTED]@epa.gov]; [REDACTED]  
[REDACTED]@epa.gov]; [REDACTED]@epa.gov]  
**Subject:** RE: Iron and Steel administrative stay -- signed

Great! We're all good on OPA's end. Thank you!

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 9:14 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: Iron and Steel administrative stay -- signed

We'll be posting at noon today. OPE is looped.

**From:** [REDACTED]@epa.gov>  
**Sent:** Tuesday, March 25, 2025 8:21 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: Iron and Steel administrative stay -- signed

Thanks [REDACTED]! No concerns here. Let us know when it's live.

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 5:12 PM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** Iron and Steel administrative stay -- signed

The iron and steel administrative stay was signed today. We're going to hold off till tomorrow to post online and notify. We'll advise on timing in the morning. Here's the comms plan link and the statement pasted below – thanks!

 **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 10:25 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** FW: OPA approval: upcoming OAR actions

Please let us know when these are signed and live. Also, send any updated statements when ready. Flagging for OCIR and press awareness.

**Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act:** To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

## Ex. 5 Deliberative Process (DP)

Thanks!

**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>  
**Sent:** Monday, March 24, 2025 9:28 AM  
**To:** [REDACTED]@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: OPA approval: upcoming OAR actions

Sorry for the delayed review. I think we can stick with a desk statement for the second one.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:15 PM  
**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** OPA approval: upcoming OAR actions

For OPA review. Note the second action, regarding a PR. Please let us know if you have a preferred approach.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:13 PM  
**To:** [REDACTED]@epa.gov>; AO OPA News Release Coord  
<AO\_OPA\_News\_Release\_Coord@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** Re: upcoming OAR actions

Got it! We'll flag for folks. Thanks for sending!

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:11:28 PM  
**To:** AO OPA News Release Coord <AO\_OPA\_News\_Release\_Coord@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** upcoming OAR actions

Hi all,

I have two things to flag for next week (the first I just heard about a half hour ago). I'll try to send a two week look-ahead next week, but things are coming up quickly over here!

Thanks,  
[REDACTED]

- **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act**

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

*Timing:* Monday 3/24, afternoon

*Comms:* Desk statement, social media message (will send comms plan /desk statement Monday AM)

## Ex. 5 Deliberative Process (DP)

Message

From: [REDACTED]@epa.gov]  
Sent: 3/25/2025 5:41:41 PM  
To: [REDACTED]@epa.gov]  
Subject: FW: Iron and Steel administrative stay -- signed

Hi [REDACTED] was this posted already? I wanted to share our intergov notification when it's up!

Thanks!

From: [REDACTED]@epa.gov>  
Sent: Tuesday, March 25, 2025 7:42 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: FW: Iron and Steel administrative stay -- signed

GM! Update here.

From: [REDACTED]@epa.gov>  
Sent: Tuesday, March 25, 2025 9:14 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: Iron and Steel administrative stay -- signed

We'll be posting at noon today. OPE is looped.

From: [REDACTED]@epa.gov>  
Sent: Tuesday, March 25, 2025 8:21 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: RE: Iron and Steel administrative stay -- signed

Thanks [REDACTED]! No concerns here. Let us know when it's live.

From: [REDACTED]@epa.gov>  
Sent: Monday, March 24, 2025 5:12 PM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: Iron and Steel administrative stay -- signed

The iron and steel administrative stay was signed today. We're going to hold off till tomorrow to post online and notify. We'll advise on timing in the morning. Here's the comms plan link and the statement pasted below thanks!

Ex. 5 Deliberative Process (DP)



# Ex. 5 Deliberative Process (DP)

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 10:25 AM  
**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** FW: OPA approval: upcoming OAR actions

Please let us know when these are signed and live. Also, send any updated statements when ready. Flagging for OCIR and press awareness.

**Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act:** To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

# Ex. 5 Deliberative Process (DP)

Thanks!

**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>  
**Sent:** Monday, March 24, 2025 9:28 AM  
**To:** [REDACTED]@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: OPA approval: upcoming OAR actions

Sorry for the delayed review. I think we can stick with a desk statement for the second one.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:15 PM

To: Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
Subject: OPA approval: upcoming OAR actions

For OPA review. Note the second action, regarding a PR. Please let us know if you have a preferred approach.

From: [REDACTED]@epa.gov  
Sent: Friday, March 21, 2025 6:13 PM  
To: [REDACTED]@epa.gov; AO OPA News Release Coord  
<AO\_OPA\_News\_Release\_Coord@epa.gov>  
Cc: [REDACTED]@epa.gov  
Subject: Re: upcoming OAR actions

Got it! We'll flag for folks. Thanks for sending!

From: [REDACTED]@epa.gov  
Sent: Friday, March 21, 2025 6:11:28 PM  
To: AO OPA News Release Coord <AO\_OPA\_News\_Release\_Coord@epa.gov>  
Cc: [REDACTED]@epa.gov  
Subject: upcoming OAR actions

Hi all,  
I have two things to flag for next week (the first I just heard about a half hour ago). I'll try to send a two week look-ahead next week, but things are coming up quickly over here!

Thanks,  
[REDACTED]

- **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act**  
To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).  
*Timing:* Monday 3/24, afternoon  
*Comms:* Desk statement, social media message (will send comms plan /desk statement Monday AM)

## Ex. 5 Deliberative Process (DP)





Message

---

**From:** [REDACTED]  
**Sent:** 3/24/2025 6:04:04 PM  
**To:** Abboud, Michael [abboud.michael@epa.gov]; [REDACTED]@epa.gov]  
**CC:** [REDACTED]@epa.gov]  
**Subject:** FW: NESHAP (Clean Air Act Toxics regs) Presidential Exemptions

Hi Mike and [REDACTED] following up on this 3.11.2 press release -- heads up that we're going live at 3pm today with information in the banner of this website announcing that facilities can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for the nine Clean Air Act regs flagged in that release. The email box is live now and OAQPS staff have access to it.

OAQPS will be letting the industry contacts who cover those sectors know as well.

Statements and background in the comms plan --

Communication Strategy: [REDACTED] 112 Presidential Exemptions -- announcing process -- Com Strategy.docx  
Web text (and text for emails to stakeholders) - [REDACTED] 2025.03.21\_Presidential Exemption Directions\_ Egdits.docx

I'll confirm when the page is live @ about 3.

We're here for any questions --

Thanks --

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Monday, March 24, 2025 1:40 PM  
**To:** [REDACTED]@epa.gov; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Subject:** RE: NESHAP Pres Exemptions

[REDACTED] this looks good to me. If you can give OPE a heads up since I know they have gotten some questions on this, I would greatly appreciate it. I did not see the lists that this would go out to, but if we can send them to the lists of people who would receive information on these NESHAPs, I would greatly appreciate it.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] office)  
[REDACTED] (mobile)

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 11:37 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>

Cc: [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>

**Subject:** NESHAP Pres Exemptions

Hi Aaron, Abbie and Alex – Comms plan and web text linked below. Just wanted to check if industry, Hill, or intergov notifications are needed before or after the web goes live, or if we should just post this afternoon and leave it at that for today. OPA is plugged in, so we're good there, but if you like, we can flag for OCIR and public engagement (Mike Abboud & team), too, so they're aware.

At 3pm today OAQPS is planning post information in the banner of this website announcing that facilities can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for the nine NESHAPS identified in the [3/12 press release](#). The email box is live now and OAQPS staff have access to it.

The communication strategy has the desk statement and a social media post, and we can add a notification list if needed. There are a couple of q/a in the comms plan that will need fleshing out in case we're asked.

Communication Strategy: [\[REDACTED\] 112 Presidential Exemptions -- announcing process -- Com Strategy.docx](#)  
Web text (and text for emails to stakeholders) - [\[REDACTED\] 2025.03.21 Presidential Exemption Directions Egdits.docx](#)

We'll proceed to post at 3pm, unless we hear otherwise.

Thanks

[REDACTED]

Office of Air & Radiation  
U.S. Environmental Protection Agency

[REDACTED]

Message

---

**From:** [REDACTED]  
**Sent:** 3/24/2025 7:14:29 PM  
**To:** Szabo, Aaron [Szabo.Aaron@epa.gov]; Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]  
**CC:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
**Subject:** RE: NESHAP Pres Exemptions

Better links here

<https://www.epa.gov/stationary-sources-air-pollution>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 3:08 PM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** RE: NESHAP Pres Exemptions

The pages are live --

<https://www.epa.gov/node/83201/revisions/2538570/view>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Monday, March 24, 2025 1:40 PM  
**To:** [REDACTED]@epa.gov; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** RE: NESHAP Pres Exemptions

[REDACTED] this looks good to me. If you can give OPE a heads up since I know they have gotten some questions on this, I would greatly appreciate it. I did not see the lists that this would go out to, but if we can send them to the lists of people who would receive information on these NESHAPs, I would greatly appreciate it.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** [REDACTED]@epa.gov  
**Sent:** Monday, March 24, 2025 11:37 AM

**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tardif, Abigale (Abbie) <Tardif.Abigale@epa.gov>; Dominguez, Alexander <dominguez.alexander@epa.gov>; OAR Briefings <OAR\_Briefings@epa.gov>  
**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** NESHAP Pres Exemptions

Hi Aaron, Abbie and Alex – Comms plan and web text linked below. Just wanted to check if industry, Hill, or intergov notifications are needed before or after the web goes live, or if we should just post this afternoon and leave it at that for today. OPA is plugged in, so we're good there, but if you like, we can flag for OCIR and public engagement (Mike Abboud & team), too, so they're aware.

At 3pm today OAQPS is planning post information in the banner of this website announcing that facilities can submit requests for a Presidential Exemption under section 112(i)(4) of the Clean Air Act for the nine NESHAPS identified in the [312 press release](#). The email box is live now and OAQPS staff have access to it.

The communication strategy has the desk statement and a social media post, and we can add a notification list if needed. There are a couple of q/a in the comms plan that will need fleshing out in case we're asked.

Communication Strategy: [\[112 Presidential Exemptions -- announcing process -- Com Strategy.docx\]](#)

Web text (and text for emails to stakeholders) - [\[2025.03.21 Presidential Exemption Directions\\_Egdits.docx\]](#)

We'll proceed to post at 3pm, unless we hear otherwise.

Thanks

[REDACTED]

Office of Air & Radiation  
U.S. Environmental Protection Agency

[REDACTED]

Message

**From:** [REDACTED]  
**Sent:** 3/24/2025 7:14:44 PM  
**To:** Vaseliou, Molly [Vaseliou.Molly@epa.gov]; [REDACTED]@epa.gov; Mandy, Cora [Mandy.Cora@epa.gov]; [REDACTED]@epa.gov; Abboud, Michael [abboud.michael@epa.gov]  
**CC:** [REDACTED]@epa.gov  
**Subject:** RE: OPA approval: upcoming OAR actions

Use these links – thanks!

<https://www.epa.gov/stationary-sources-air-pollution>

<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

**From:** [REDACTED]  
**Sent:** Monday, March 24, 2025 3:08 PM  
**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; [REDACTED]@epa.gov; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]@epa.gov; Abboud, Michael <abboud.michael@epa.gov>  
**Cc:** [REDACTED]@epa.gov  
**Subject:** RE: OPA approval: upcoming OAR actions

Thanks, Molly – the pages are live –  
<https://www.epa.gov/node/83201/revisions/2538570/view>  
<https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

Here are links to the comms plan and information for stakeholders and affected industry/facilities –

Communication Strategy: **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Web text (and text for emails to stakeholders) – **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>  
**Sent:** Monday, March 24, 2025 3:01 PM  
**To:** [REDACTED]@epa.gov; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]@epa.gov; Abboud, Michael <abboud.michael@epa.gov>  
**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov  
**Subject:** Re: OPA approval: upcoming OAR actions

Thanks! Adding Abboud for awareness.



## Get Outlook for iOS

**From:** [REDACTED]@epa.gov>  
**Sent:** Monday, March 24, 2025 2:51:09 PM  
**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: OPA approval: upcoming OAR actions

For awareness, this (noted below) will be live at 3pm today.

### Desk statement

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules listed below, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

The Clean Air Act allows the President to exempt stationary sources of air pollution from compliance with any standard or limitation under section 112 for up to two years if the technology to implement the standard is not available and it is in the national security interests of the United States to do so.

**From:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>  
**Sent:** Monday, March 24, 2025 9:28 AM  
**To:** [REDACTED]@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
**Subject:** RE: OPA approval: upcoming OAR actions

Sorry for the delayed review. I think we can stick with a desk statement for the second one.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:15 PM  
**To:** Vaseliou, Molly <Vaseliou.Molly@epa.gov>; Mandy, Cora <Mandy.Cora@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** OPA approval: upcoming OAR actions

For OPA review. Note the second action, regarding a PR. Please let us know if you have a preferred approach.

**From:** [REDACTED]@epa.gov>  
**Sent:** Friday, March 21, 2025 6:13 PM  
**To:** [REDACTED]@epa.gov>; AO OPA News Release Coord  
<AO\_OPA\_News\_Release\_Coord@epa.gov>  
**Cc:** [REDACTED]@epa.gov>  
**Subject:** Re: upcoming OAR actions

Got it! We'll flag for folks. Thanks for sending!

From: [REDACTED]@epa.gov>  
Sent: Friday, March 21, 2025 6:11:28 PM  
To: AO OPA News Release Coord <AO\_OPA\_News\_Release\_Coord@epa.gov>  
Cc: [REDACTED]@epa.gov>  
Subject: upcoming OAR actions

Hi all,

I have two things to flag for next week (the first I just heard about a half hour ago). I'll try to send a two week look-ahead next week, but things are coming up quickly over here!

Thanks,

[REDACTED]

- **Announcing Streamlined Process for the Regulated Community to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act**

To advance President Trump's Executive Orders and Power the Great American Comeback, EPA has set up an electronic mailbox to allow the regulated community subject to nine Clean Air Act rules, known as National Emission Standards for Hazardous Air Pollutants, to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act. A request for a Presidential Exemption may be submitted through [airaction@epa.gov](mailto:airaction@epa.gov).

*Timing:* Monday 3/24, afternoon

*Comms:* Desk statement, social media message (will send comms plan /desk statement Monday AM)

- **Ex. 5 Deliberative Process (DP)**



Message

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**From:** [REDACTED]  
**Sent:** 3/24/2025 2:22:18 PM  
**To:** [REDACTED]@epa.gov  
**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Thanks [REDACTED]

**From:** [REDACTED]@epa.gov  
**Sent:** Monday, March 24, 2025 9:44 AM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Sorry to be late to the party. I had a few tweaks/additions to the paper.

[REDACTED]  
Air and Radiation Law Office  
Office of General Counsel  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
[REDACTED]

**From:** [REDACTED]@epa.gov  
**Sent:** Friday, March 21, 2025 4:50 PM  
**To:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
**Cc:** [REDACTED]@epa.gov; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov; [REDACTED]  
<[REDACTED]@epa.gov>  
**Subject:** RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

[REDACTED]  
Go ahead and talk with the [REDACTED] staff. I will share with Aaron your concern and let him know we will follow up with him on Monday.

[REDACTED]  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
[REDACTED]

From: [REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 4:10 PM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov> [REDACTED]  
<[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Two notes from me. First, I think it would be good to have

Ex. 5 AC/DP

# Ex. 5 AC/DP

-----++-----

From: [REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 2:59 PM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov> [REDACTED]  
<[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

It is my understanding that **Ex. 5 Deliberative Process (DP)** If you have a suggestion please use redline/strikeout. As I will share any edits with Aaron.

[REDACTED]  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency

From: [REDACTED]@epa.gov>

Sent: Friday, March 21, 2025 2:40 PM

To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

Cc: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov> [REDACTED]  
<[REDACTED]@epa.gov>

Subject: RE: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

## Ex. 5 Deliberative Process (DP)

I wanted to check on the goal for this exercise.

**From:** [REDACTED]@epa.gov>

**Sent:** Friday, March 21, 2025 2:32 PM

**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>

**Cc:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]

<[REDACTED]@epa.gov>; [REDACTED]@epa.gov> [REDACTED]

<[REDACTED]@epa.gov>

**Subject:** FW: 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

I just discussed with [REDACTED] that I wanted to get any OGC feedback on the draft announcement on setting up an email box for entities to request a compliance extension under 112(i)(4). OAR would like this to be posted by Monday. I told them I would seek your input/review today and circle back with them on whether we could get this posted by Monday. Let [REDACTED] know if you have any problems accessing the shared file linked below.

Link to shared file: **Ex. 5 Deliberative Process (DP)**

[REDACTED]  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27711  
[REDACTED]

**From:** [REDACTED]

**Sent:** Friday, March 21, 2025 2:15 PM

**To:** [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
[REDACTED]@epa.gov>

**Subject:** 2025.03.21\_Presidential Exemption Directions\_ Edits.docx

Please see Aaron's edits attached. We need to share with OGC for their review/input. Who should be on point for that? He would also like to have this posted on Monday. Let me know if that's possible.

Message

From: [REDACTED]@epa.gov]  
Sent: 3/25/2025 4:00:16 PM  
To: [REDACTED]@epa.gov]  
Subject: FW: 112 Prez Exemption FYI

FYI

From: [REDACTED]@epa.gov>  
Sent: Tuesday, March 25, 2025 11:58 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]  
<[REDACTED]@epa.gov>; [REDACTED]@epa.gov>; [REDACTED]@epa.gov>;  
[REDACTED]@epa.gov>  
Subject: FW: 112 Prez Exemption FYI

Thank you, [REDACTED], for flagging this. If you go to the link below, you will see that the EPA has taken the first step towards facilitating Presidential exemptions from compliance with 112 NESHAP under section 112(i)(4) of the CAA. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

[REDACTED]

From: [REDACTED]@epa.gov>  
Sent: Tuesday, March 25, 2025 11:20 AM  
To: [REDACTED]@epa.gov>; [REDACTED]@epa.gov>  
Subject: 112 Prez Exemption FYI

FYI, this site appears to have gone live yesterday: <https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>

[REDACTED]  
Attorney-Advisor, EPA OGC  
[REDACTED]

Message

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**From:** Tisa, Nathaniel [Tisa.Nathaniel@epa.gov]  
**Sent:** 3/11/2025 4:01:58 PM  
**To:** Donahue, Sean [donahue.sean@epa.gov]; Szabo, Aaron [Szabo.Aaron@epa.gov]  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Agree on timeline. Thanks for writing it out, Aaron.

Nathaniel Tisa  
Deputy General Counsel  
U.S. Environmental Protection Agency  
[REDACTED]

**From:** Donahue, Sean <donahue.sean@epa.gov>  
**Sent:** Tuesday, March 11, 2025 11:55 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Subject:** Re: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

That should be doable.

[Get Outlook for iOS](#)

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Tuesday, March 11, 2025 11:54:28 AM  
**To:** Donahue, Sean <donahue.sean@epa.gov>; Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Would the end of the week be possible? I think that after the announcement tomorrow we will be getting a lot of incoming and would like to make sure we can provide the correct information.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** Donahue, Sean <donahue.sean@epa.gov>  
**Sent:** Tuesday, March 11, 2025 11:53 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Subject:** Re: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Aaron,

OGC will look into it. When would you like a response?

Sean

[Get Outlook for iOS](#)

From: Szabo, Aaron <Szabo.Aaron@epa.gov>  
Sent: Tuesday, March 11, 2025 11:23:28 AM  
To: Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
Cc: Donahue, Sean <donahue.sean@epa.gov>  
Subject: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Hey Nate,

I was wondering if it would be possible for OGC to provide an analysis of **Ex. 5 AC/DP**

**Ex. 5 AC/DP**

I was wondering (1) **Ex. 5 AC/DP**

**Ex. 5 AC/DP**

**Ex. 5 AC/DP**

Happy to discuss this in more detail if you would like.

**(4)Presidential exemption**  
The President may exempt any stationary source from compliance with any standard or limitation under this section for a period of not more than 2 years if the President determines that the technology to implement such standard is not available and that it is in the national security interests of the United States to do so. An exemption under this paragraph may be extended for 1 or more additional periods, each period not to exceed 2 years. The President shall report to Congress with respect to each exemption (or extension thereof) made under this paragraph.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
(office)  
(mobile)



Message

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**From:** Tisa, Nathaniel [Tisa.Nathaniel@epa.gov]  
**Sent:** 3/19/2025 2:51:20 PM  
**To:** Szabo, Aaron [Szabo.Aaron@epa.gov]; Donahue, Sean [donahue.sean@epa.gov]  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption  
**Attachments:** NESHAP Presidential Exemption DRAFT 03.19.2025.docx

Aaron,

Attaching a high-level write-up here. Feel free to call with questions.

**Nathaniel Tisa**  
Deputy General Counsel  
U.S. Environmental Protection Agency  
[REDACTED]

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Wednesday, March 19, 2025 9:35 AM  
**To:** Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>; Donahue, Sean <donahue.sean@epa.gov>  
**Subject:** Re: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

11:15am.

Thanks,

Aaron Szabo  
[REDACTED]

**From:** Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Sent:** Wednesday, March 19, 2025 9:34:01 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Donahue, Sean <donahue.sean@epa.gov>  
**Subject:** Re: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

What time is the meeting? Will make sure you have at least initial answers to these questions.

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Wednesday, March 19, 2025 7:35:50 AM  
**To:** Donahue, Sean <donahue.sean@epa.gov>; Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Hey all – just wanted to follow up on this. I know there is a meeting today on this issue and was wondering if OGC had a memo I can read before we have the meeting today.

Thanks,


Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)



**From:** Szabo, Aaron  
**Sent:** Tuesday, March 11, 2025 11:54 AM  
**To:** Donahue, Sean <donahue.sean@epa.gov>; Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Would the end of the week be possible? I think that after the announcement tomorrow we will be getting a lot of incoming and would like to make sure we can provide the correct information.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
 (office)  
(mobile)

**From:** Donahue, Sean <donahue.sean@epa.gov>  
**Sent:** Tuesday, March 11, 2025 11:53 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Subject:** Re: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Aaron,

OGC will look into it. When would you like a response?

Sean

Get [Outlook for iOS](#)

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Tuesday, March 11, 2025 11:23:28 AM  
**To:** Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Cc:** Donahue, Sean <donahue.sean@epa.gov>  
**Subject:** Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Hey Nate,

I was wondering if it would be possible for OGC to provide an analysis of 

Ex. 5 AC/DP

**Ex. 5 AC/DP**

I was wondering (1

**Ex. 5 AC/DP**

**Ex. 5 AC/DP**

Happy to discuss this in more detail if you would like.

**(4)Presidential exemption**

The President may exempt any stationary source from compliance with any standard or limitation under this section for a period of not more than 2 years if the President determines that the technology to implement such standard is not available and that it is in the national security interests of the United States to do so. An exemption under this paragraph may be extended for 1 or more additional periods, each period not to exceed 2 years. The President shall report to Congress with respect to each exemption (or extension thereof) made under this paragraph.

Thanks,

Aaron Szabo

Senior Advisor to the Administrator

[REDACTED] (office)


[REDACTED] (mobile)

Message

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**From:** Szabo, Aaron [Szabo.Aaron@epa.gov]  
**Sent:** 3/7/2025 8:44:23 PM  
**To:** Dominguez, Alexander [dominguez.alexander@epa.gov]; Tardif, Abigale (Abbie) [Tardif.Abigale@epa.gov]  
**Subject:** Fw: Draft List of Actions

Thanks,

Aaron Szabo  


**From:** Szabo, Aaron  
**Sent:** Friday, March 7, 2025 10:22:56 AM  
**To:** Gall, Daniel <Gall.Daniel@epa.gov>  
**Subject:** FW: Draft List of Actions

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
 (office)  
(mobile)

**From:** Szabo, Aaron  
**Sent:** Wednesday, March 5, 2025 9:59 PM  
**To:** Amidon, Eric <Amidon.Eric@epa.gov>  
**Cc:** Voyles, Travis <voyles.travis@epa.gov>; Vaseliou, Molly <Vaseliou.Molly@epa.gov>  
**Subject:** Draft List of Actions

Hey Eric,

The Administrator asked for a list of potential actions for discussions with the WH. Below is the draft list. Travis and Molly – please let me know if you think I am missing anything or anything should be taken off. Also

## Ex. 5 Deliberative Process (DP)

### List of Actions

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

**Ex. 5 Deliberative Process (DP)**

8.  
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15. **Ex. 5 Deliberative Process (DP)**  
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22.  
23.  
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25.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

Message

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**From:** Szabo, Aaron [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8C8381AA833244A3842DC4819F6ABE91-8C0505F1-A1]  
**Sent:** 3/12/2025 2:47:34 AM  
**To:** Underwood, Emily A. EOP/WHO **Ex. 6 Personal Privacy (PP)**  
**Subject:** RE: Presidential Exemption Language

Thanks!

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** Underwood, Emily A. EOP/WHO **Ex. 6 Personal Privacy (PP)**  
**Sent:** Tuesday, March 11, 2025 10:32 PM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Subject:** RE: Presidential Exemption Language

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

I think this is in the same spirit and fine.

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Tuesday, March 11, 2025 10:30 PM  
**To:** Underwood, Emily A. EOP/WHO **Ex. 6 Personal Privacy (PP)**  
**Subject:** Presidential Exemption Language

Hey Emily,

Since the President is not announcing anything tomorrow related to the EPA announcements, I was thinking of having the following language in the press releases, which is vaguer than what we had previously, but sends the signal to industry since the citation is the Presidential exemption. Let me know what you think:

**Ex. 5 Deliberative Process (DP)**

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

Message

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**From:** Szabo, Aaron [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8C8381AA833244A3842DC4819F6ABE91-8C0505F1-A1]  
**Sent:** 3/19/2025 2:55:41 PM  
**To:** Tisa, Nathaniel [Tisa.Nathaniel@epa.gov]; Donahue, Sean [donahue.sean@epa.gov]  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Nate,

Thank you so much for this. This is awesome and really helpful. I was talking to OAR staff this morning about potentially

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Sent:** Wednesday, March 19, 2025 10:51 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Donahue, Sean <donahue.sean@epa.gov>  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Aaron,

Attaching a high-level write-up here. Feel free to call with questions.

**Nathaniel Tisa**  
Deputy General Counsel  
U.S. Environmental Protection Agency  
[REDACTED]

**From:** Szabo, Aaron <Szabo.Aaron@epa.gov>  
**Sent:** Wednesday, March 19, 2025 9:35 AM  
**To:** Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>; Donahue, Sean <donahue.sean@epa.gov>  
**Subject:** Re: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

11:15am.

Thanks,

Aaron Szabo  
[REDACTED]

**From:** Tisa, Nathaniel <Tisa.Nathaniel@epa.gov>  
**Sent:** Wednesday, March 19, 2025 9:34:01 AM  
**To:** Szabo, Aaron <Szabo.Aaron@epa.gov>; Donahue, Sean <donahue.sean@epa.gov>  
**Subject:** Re: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

What time is the meeting? Will make sure you have at least initial answers to these questions.

**From:** Szabo, Aaron <[Szabo.Aaron@epa.gov](mailto:Szabo.Aaron@epa.gov)>  
**Sent:** Wednesday, March 19, 2025 7:35:50 AM  
**To:** Donahue, Sean <[donahue.sean@epa.gov](mailto:donahue.sean@epa.gov)>; Tisa, Nathaniel <[Tisa.Nathaniel@epa.gov](mailto:Tisa.Nathaniel@epa.gov)>  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Hey all – just wanted to follow up on this. I know there is a meeting today on this issue and was wondering if OGC had a memo I can read before we have the meeting today.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** Szabo, Aaron  
**Sent:** Tuesday, March 11, 2025 11:54 AM  
**To:** Donahue, Sean <[donahue.sean@epa.gov](mailto:donahue.sean@epa.gov)>; Tisa, Nathaniel <[Tisa.Nathaniel@epa.gov](mailto:Tisa.Nathaniel@epa.gov)>  
**Subject:** RE: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Would the end of the week be possible? I think that after the announcement tomorrow we will be getting a lot of incoming and would like to make sure we can provide the correct information.

Thanks,

Aaron Szabo  
Senior Advisor to the Administrator  
[REDACTED] (office)  
[REDACTED] (mobile)

**From:** Donahue, Sean <[donahue.sean@epa.gov](mailto:donahue.sean@epa.gov)>  
**Sent:** Tuesday, March 11, 2025 11:53 AM  
**To:** Szabo, Aaron <[Szabo.Aaron@epa.gov](mailto:Szabo.Aaron@epa.gov)>; Tisa, Nathaniel <[Tisa.Nathaniel@epa.gov](mailto:Tisa.Nathaniel@epa.gov)>  
**Subject:** Re: Legal Analysis of CAA 112(i)(4) - Presidential Exemption

Aaron,

OGC will look into it. When would you like a response?

Sean

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**From:** Szabo, Aaron <[Szabo.Aaron@epa.gov](mailto:Szabo.Aaron@epa.gov)>  
**Sent:** Tuesday, March 11, 2025 11:23:28 AM  
**To:** Tisa, Nathaniel <[Tisa.Nathaniel@epa.gov](mailto:Tisa.Nathaniel@epa.gov)>  
**Cc:** Donahue, Sean <[donahue.sean@epa.gov](mailto:donahue.sean@epa.gov)>  
**Subject:** Legal Analysis of CAA 112(i)(4) - Presidential Exemption



Hey Nate,

I was wondering if it would be possible for OGC to provide an analysis of

Ex. 5 AC/DP

**Ex. 5 AC/DP**

I was wondering (1)

**Ex. 5 AC/DP**

**Ex. 5 AC/DP**

Happy to discuss this in more detail if you would like.

**(4)Presidential exemption**

The President may exempt any stationary source from compliance with any standard or limitation under this section for a period of not more than 2 years if the President determines that the technology to implement such standard is not available and that it is in the national security interests of the United States to do so. An exemption under this paragraph may be extended for 1 or more additional periods, each period not to exceed 2 years. The President shall report to Congress with respect to each exemption (or extension thereof) made under this paragraph.

Thanks,

Aaron Szabo

Senior Advisor to the Administrator

(office)

(mobile)